The Blu-Frog Investment Fund

Annual Report

for the year ended 31 May 2024

Contents

	Page
Report of the Authorised Corporate Director	2
Statement of the Authorised Corporate Director's responsibilities	4
Assessment of Value - The Blu-Frog Investment Fund	5
Report of the Depositary to the shareholders of The Blu-Frog Investment Fund	9
Independent Auditor's report to the shareholders of The Blu-Frog Investment Fund	10
Accounting policies of The Blu-Frog Investment Fund	13
Investment Manager's report	16
Summary of portfolio changes	17
Portfolio statement	18
Risk and reward profile	21
Comparative table	22
Financial statements:	
Statement of total return	23
Statement of change in net assets attributable to shareholders	23
Balance sheet	24
Notes to the financial statements	25
Distribution table	34
Remuneration	35
Further information	37
Appointments	38

The Blu-Frog Investment Fund

Report of the Authorised Corporate Director ('ACD')

Evelyn Partners Fund Solutions Limited, as ACD, presents herewith the Annual Report for The Blu-Frog Investment Fund for the year ended 31 May 2024.

The Blu-Frog Investment Fund ('the Company' or 'the Fund') is an authorised open-ended investment company with variable capital ('ICVC') further to an authorisation order dated 8 November 2010. The Company is incorporated under registration number IC000842. It is a non-UCITS retail scheme ('NURS') complying with the investment and borrowing powers rules in the Collective Investment Schemes sourcebook ('COLL') and the Investment Funds sourcebook ('FUND'), as published by the Financial Conduct Authority ('FCA'). As the Company is a NURS, the ACD also acts as Alternative Investment Fund Manager ('AIFM') in order to comply with the Alternative Investment Fund Manager's Directive ('AIFMD').

The ACD is of the opinion that it is appropriate to continue to adopt the going concern basis in the preparation of the accounts as the assets of the Company consist predominantly of securities which are readily realisable and, accordingly, the Company has adequate financial resources to continue in operational existence for the foreseeable future. Further, appropriate accounting policies, consistently applied and supported by reasonable and prudent judgements and estimates, have been used in the preparation of these accounts and applicable accounting standards have been followed.

The Financial Stability Board ('FSB') created the Task Force on Climate-related Financial Disclosures ('TCFD') to improve and increase reporting of climate-related financial information. EPFL have produced TCFD reports in compliance with the FCA's rules on climate-related financial disclosures. The TCFD Product report is designed to help you understand the impact the Fund has on the climate and equally how climate change could influence the performance of the Fund. The report will also give you the ability to compare a range of climate metrics with other funds. To understand the governance, strategy, and risk management that EPFL has in place to manage the risks and opportunities related to climate change, please refer to the TCFD Entity report. These reports are available on our website at: https://www.evelyn.com/services/fund-solutions/tcfd-reporting/.

The shareholders are not liable for the debts of the Company.

The Company has no Directors other than the ACD.

The Instrument of Incorporation can be inspected at the offices of the ACD.

Copies of the Prospectus and Key Investor Information Document ('KIID') are available on request free of charge from the ACD.

Investment objective and policy

The objective of the Company is to maximise the best total return available (capital and income) through investment in some or all asset classes, including money markets, in some or all world markets, including the UK.

The investment policy will be to invest in transferable securities, collective investment schemes (which may include regulated and unregulated schemes), warrants, money market instruments, cash, and deposits that can best take advantage of economic opportunities worldwide. The Company may also invest in gold. Subject to restrictions set out in the Prospectus and any applicable regulatory restrictions there is no limit to which the Company can be invested in each sector. This means that from time to time, the Company may be concentrated in a particular sector or asset class depending on the prevailing market conditions and investment opportunities available (at all times within the limits set out in the Collective Investment Schemes sourcebook in the FCA Rules).

It is the ACD's intention that derivatives be used for Efficient Portfolio Management ('EPM'). As a result, the net asset value of the Company could potentially be more volatile, however, it is the Investment Manager's intention that the Company, owing to their portfolio composition or the portfolio management techniques used, will not have volatility over and above the general market volatility of the markets of their underlying investments. The use of derivatives for EPM is not intended to increase the risk profile of the Company. The Company may only invest in derivatives for investment purposes on the giving of 60 days' notice to the shareholders. The use of derivatives for investment purposes may involve additional risks for shareholders. These additional risks include leverage factors associated with transactions in the Company. To the extent that derivatives are used for investment purposes, the overall risk of loss to the Company, and hence the Company's risk profile, may be increased. The Company may also invest in immovable property on the giving of 60 days' notice to shareholders.

Please be aware that there is no guarantee capital will be preserved.

Report of the Authorised Corporate Director (continued)

Changes affecting the Company in the year

There were no fundamental or significant changes to the Company in the year.

Further information in relation to the Company is illustrated on page 37.

In accordance with the requirements of the Financial Conduct Authority's Collective Investment Schemes sourcebook and the Investment Funds sourcebook, we hereby certify the Annual Report on behalf of the ACD, Evelyn Partners Fund Solutions Limited.

Neil Coxhead Director Evelyn Partners Fund Solutions Limited 6 September 2024

Statement of the Authorised Corporate Director's responsibilities

The Collective Investment Schemes sourcebook ('COLL') and the Investment Funds sourcebook ('FUND') published by the FCA, require the Authorised Corporate Director ('ACD') to prepare financial statements for each annual accounting period which give a true and fair view of the financial position of the Company and of the net revenue and net capital gains on the scheme property of the Company for the year.

In preparing the financial statements the ACD is responsible for:

- selecting suitable accounting policies and then applying them consistently;
- making judgements and estimates that are reasonable and prudent;
- following UK accounting standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland;
- complying with the disclosure requirements of the Statement of Recommended Practice for the Financial Statements of UK Authorised Funds ('the SORP') issued by The Investment Association in May 2014 and amended in June 2017;
- keeping proper accounting records which enable it to demonstrate that the financial statements as prepared comply with the above requirements;
- assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern;
- using the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so;
- such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error;
- taking reasonable steps for the prevention and detection of fraud and irregularities; and
- the maintenance and integrity of the Company's information on the ACD's website. Legislation in the UK governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

COLL also requires the ACD to carry out an Assessment of Value on the Company and publish this assessment within the Annual Report.

The ACD is responsible for the management of the Company in accordance with the Instrument of Incorporation, the Prospectus, COLL and FUND.

Assessment of Value - The Blu-Frog Investment Fund

In line with the provisions contained within COLL 6.6.20R, the Board of Evelyn Partners Fund Solutions Limited ('EPFL') as Authorised Corporate Director ('ACD'), has carried out an Assessment of Value for The Blu-Frog Investment Fund ('the Fund'). Furthermore, the rules require that EPFL publishes these assessments.

A high-level summary of the outcome of EPFL's rigorous review of the Fund, for the year ended 31 May 2024, using the seven criteria set by the FCA is set out below:

1. Quality of Service	
2. Performance	
3. ACD Costs	
4. Economies of Scale	
5. Comparable Market Rates	
6. Comparable Services	
7. Classes of Shares	
Overall Rating	

EPFL has adopted a traffic light system to show how it rated the Fund:

On balance, the Board believes the Fund has delivered value to shareholders, with no material issues noted.

On balance, the Board believes the Fund has delivered value to shareholders, but may require some action.

On balance, the Board believes the Fund has not delivered value to shareholders and significant remedial action is now planned by the Board.

How EPFL assessed each of the seven criteria and the rating arrived at are discussed in greater detail on the following pages.

EPFL has created an Assessment of Value Committee ('AVC'), for the review, challenge and approval of all funds' Assessments of Value. Ultimately the assessments will be subject to scrutiny by the Board (which includes independent directors) to ensure the outcomes of the assessments are clear and fair, before final sign-off by the chair of the Board prior to communicating to investors if the Fund has delivered value, and if not, where improvements need to be made.

In carrying out the assessment, the EPFL AVC has separately considered, the following seven criteria stipulated by the FCA. The Committee may also have considered other issues where it was deemed appropriate.

EPFL believes the Assessment of Value can make it easier for investors to both evaluate whether the Fund is providing them with value for money and make more informed decisions when choosing investments.

The seven criteria are:

- (1) Quality of service the quality of every aspect of the service provided, including, for example, accounting, administration, customer services and communications;
- (2) Performance how the Fund performed, including whether it met targets and objectives, kept to relevant policy, followed relevant principles, kept to reasonable timescales;
- (3) ACD costs the fairness and value of the Fund's costs, including entry and exit fees, early redemption fees, administration charges;
- (4) Economies of scale how costs have been or can be reduced as a result of increased assets-under-management ('AUM'), and whether or not those savings have been passed on to investors;
- (5) Comparable market rates how the costs of the Fund compare with others in the marketplace;
- (6) Comparable services how the charges applied to the Fund compare with those of other funds administered by EPFL;
- (7) Classes of shares the appropriateness of the classes of shares in the Fund for investors.

Assessment of Value - The Blu-Frog Investment Fund (continued)

1. Quality of Service

What was assessed in this section?

Internal Factors

EPFL, as ACD, has overall responsibility for the Fund. The Board assessed, amongst other things: the day-to-day administration of the Fund; the maintenance of scheme documentation (such as prospectuses and key investor information documents ('KIIDs')); the pricing and valuation of shares; the calculation of income and distribution payments; the maintenance of accounting and other records; the preparation of annual audited and half-yearly Report & Accounts; the review of tax provisions and submission of tax computations to HMRC; the maintenance of the register of shareholders; the dealing and settlement arrangements and the quality of marketing material sent to shareholders. EPFL delegates the Investment Management of the Fund to an Investment Management firm.

The Board reviewed information provided by EPFL's control functions on the adequacy of its internal services, including governance, operations and monitoring. Elements important to the investor experience such as the timely payment of settlement and distribution monies were also reviewed. Over the past year, EPFL has been audited by internal and external auditors, the Fund's Depositary and various EPFL delegated Investment Managers.

External Factors

The Board assessed the delegate's skills, processes and experience. Also considered were any results from service review meetings as well as the annual due diligence performed by EPFL on the delegated Investment Manager, Evelyn Partners Investment Management LLP ('EPIM'), where consideration was given to, amongst other things, the delegate's controls around the Fund's liquidity management.

The Board also considered the nature, extent and quality of administrative and shareholder services performed under separate agreements covering depositary services, custodians, as well as services provided with regard to both audit and legal functions.

What was the outcome of the assessment?

Internal Factors

The Board recognised that all distribution and settlement monies were paid in a timely manner and that there were no significant findings as a result of the various audits performed on EPFL during the year. In addition, EPFL has performed its own independent analysis, using automated systems, of the Fund's liquidity. The Board concluded that EPFL had carried out its duties diligently.

External Factors

The Board concluded that the nature, extent and quality of the services provided by the external parties have benefitted and should continue to benefit the Fund and its shareholders.

Were there any follow up actions?

There were no follow-up actions required.

2. Performance

What was assessed in this section?

The Board reviewed the performance of the Fund, after the deduction of all payments out of the scheme property as set out in the Prospectus. Performance, against its benchmark, was considered over appropriate timescales having regard to the Fund's investment objective, policy and strategy. The Board also considered whether an appropriate level of market risk had been taken.

Investment Objective

The Fund aims to maximise the best total return available (capital and income) through investment in some or all asset classes, including money markets, in some or all world markets, including the UK.

Benchmark

As ACD, EPFL is required to explain in a fund's scheme documentation why a benchmark is being used or alternatively explain how investors should assess performance of a fund in the absence of a benchmark.

Assessment of Value - The Blu-Frog Investment Fund (continued)

2. Performance (continued)

Benchmark (continued)

The benchmark for the Fund is the UK Consumer Price Index +3%, which is a comparator. A 'comparator' benchmark is an index or similar factor against which an investment manager invites investors to compare a fund's performance. Details of how the Fund had performed against its comparator benchmark over various timescales can be found below.

Cumulative Performance as at 30 April 2024 (%)

	Currency	1 year	3 year	5 year
The Blu-Frog Investment Fund	GBX	14.38	9.68	38.49
UK Consumer Price Index +3%	GBP	5.47	32.50	43.84

Data provided by FE fundinfo. Care has been taken to ensure that the information is correct but FE fundinfo neither warrants, represents nor guarantees the contents of the information, nor does it accept any responsibility for errors, inaccuracies, omissions or any inconsistencies herein.

Performance is calculated net of fees. Past performance is not a guide to future performance.

What was the outcome of the assessment?

The Board assessed the performance of the Fund over its minimum recommended holding period of five years and observed that it has underperformed its comparator benchmark, the UK Consumer Price Index +3%. As a result, an Amber rating has been given. The Board were mindful that the Fund's relative underperformance in 2022 had significantly impacted the five year cumulative figure and that since then, with the rate of inflation reverting back to a more normal level, the Fund has performed well relative to the benchmark.

Consideration was given to the risk metrics associated with the Fund which focused on, amongst other things, volatility and risk adjusted returns where EPFL were comfortable that the outcomes were in line with the Fund's performance.

The Board found that the Fund is investing in the asset classes permitted by the investment policy and that there have been no breaches of the policy in the last 12 months.

Were there any follow up actions?

EPFL will continue to monitor performance through its normal oversight process, at least bi-annually.

3. ACD Costs

What was assessed in this section?

The Board reviewed each separate charge to ensure that they were reasonable and reflected the services provided. This included the annual management charge ('AMC'), Depositary/Custodian fees and audit fee. The AMC includes the ACD's periodic charge and the Investment Manager's fee.

The charges should be transparent and understandable to the investor, with no hidden costs.

What was the outcome of the assessment?

The Board received and considered information about each of the Fund's costs, and concluded that they were fair, reasonable and provided on a competitive basis.

Were there any follow up actions?

There were no follow-up actions required.

4. Economies of Scale

What was assessed in this section?

The Board reviewed each separate fee structure and the AUM of the Fund to examine the effect on the Fund to potential and existing investors should it increase or decrease in value.

What was the outcome of the assessment?

The Investment Management fee and the ACD's periodic charge are on a fixed percentage charge meaning there are no opportunities for savings going forward.

The ancillary charges of the Fund represent 8 basis points¹. Some of these costs are fixed and as the Fund grows in size may result in a small reduction in the basis point cost of these services.

Were there any follow up actions?

There were no follow-up actions required.

¹ One basis point is equal to 1/100th of 1%, or 0.01%. Figure calculated at interim report, 30 November 2023.

Assessment of Value - The Blu-Frog Investment Fund (continued)

5. Comparable Market Rates

What was assessed in this section?

The Board reviewed the ongoing charges figure ('OCF') of the Fund and how those charges affect its returns.

The OCF of the Fund was compared against the 'market rate' of similar external funds.

What was the outcome of the assessment?

The OCF of 0.97%¹ compared favourably with those of similar externally managed funds. The Board noted that there had been a fee reduction from the previous Assessment of Value. The reduction has had a positive impact on this section.

Note that EPFL has not charged an entry fee, exit fee or any other event-based fees on this Fund.

Were there any follow up actions?

There were no follow-up actions required.

6. Comparable Services

What was assessed in this section?

The Board compared the Investment Management fee with those of other funds administered by EPFL having regard to size, investment objectives and policies.

What was the outcome of the assessment?

The Investment Management fee compared favourably with other EPFL administered funds displaying similar characteristics. The Board noted that there had been a fee reduction from the previous Assessment of Value which has had a positive impact on this section.

Were there any follow up actions?

There were no follow-up actions required.

7. Classes of Shares

What was assessed in this section?

The Board reviewed the Fund's set-up to ensure that where there were multiple share classes, shareholders were in the correct share class given the size of their holding.

What was the outcome of the assessment?

There is only one share class in the Fund, therefore this part of the assessment does not apply.

Were there any follow up actions? There were no follow-up actions required.

Overall Assessment of Value

Notwithstanding the matter referenced in Section 2, the Board concluded that The Blu-Frog Investment Fund had provided value to investors.

Dean Buckley Chairman of the Board of Evelyn Partners Fund Solutions Limited 26 July 2024

Consumer Feedback

On reviewing this Assessment of Value report, we would welcome invaluable feedback from investors via our short questionnaire which can be found online:

https://www.evelyn.com/services/fund-solutions/assessment-of-value/

Investors' views are invaluable to the development and delivery of this report.

Should you be unable to access the questionnaire online please contact us directly on 0141 222 1151 and we will provide you with a paper copy of the questionnaire.

¹ Figure calculated at interim report, 30 November 2023.

Report of the Depositary to the shareholders of The Blu-Frog Investment Fund

Depositary's responsibilities

The Depositary must ensure that the Company is managed in accordance with the Financial Conduct Authority's Collective Investment Schemes sourcebook, the Investment Funds sourcebook, the Open-Ended Investment Companies Regulations 2001 (SI 2001/1228) (the OEIC regulations), as amended, the Financial Services and Markets Act 2000, as amended, (together 'the Regulations'), the Company's Instrument of Incorporation and Prospectus (together 'the Scheme documents') as detailed below.

The Depositary must in the context of its role act honestly, fairly, professionally, independently and in the interests of the Company and its investors.

The Depositary is responsible for the safekeeping of all custodial assets and maintaining a record of all other assets of the Company in accordance with the Regulations.

The Depositary must ensure that:

- the Company's cash flows are properly monitored and that cash of the Company is booked into the cash accounts in accordance with the Regulations;
- the sale, issue, redemption and cancellation of shares are carried out in accordance with the Regulations;
- the value of shares of the Company are calculated in accordance with the Regulations;
- any consideration relating to transactions in the Company's assets is remitted to the Company within the usual time limits;
- the Company's revenue is applied in accordance with the Regulations; and
- the instructions of the Alternative Investment Fund Manager ('AIFM') are carried out (unless they conflict with the Regulations).

The Depositary also has a duty to take reasonable care to ensure that the Company is managed in accordance with the Regulations and the Scheme documents in relation to the investment and borrowing powers applicable to the Company.

Having carried out such procedures as we consider necessary to discharge our responsibilities as Depositary of the Company, it is our opinion, based on the information available to us and the explanations provided, that in all material respects the Company, acting through the AIFM:

- (i) has carried out the issue, sale, redemption and cancellation, and calculation of the price of the Company's shares and the application of the Company's revenue in accordance with the Regulations and the Scheme documents of the Company; and
- (ii) has observed the investment and borrowing powers and restrictions applicable to the Company.

NatWest Trustee and Depositary Services Limited 6 September 2024

Independent Auditor's report to the shareholders of The Blu-Frog Investment Fund

Opinion

We have audited the financial statements of The Blu-Frog Investment Fund (the 'Company') for the year ended 31 May 2024, which comprise the Statement of total return, Statement of change in net assets attributable to shareholders, Balance sheet, the related Notes to the financial statements, including significant accounting policies and the Distribution table. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- Give a true and fair view of the financial position of the Company as at 31 May 2024 and of the net revenue and the net capital gains on the scheme property of the Company for the year then ended;
- Have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- Have been prepared in accordance with the Investment Association Statement of Recommended Practice for Authorised Funds, the rules of the Collective Investment Schemes sourcebook (COLL Rules) of the Financial Conduct Authority and the Instrument of Incorporation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions Relating to Going Concern

In auditing the financial statements, we have concluded that the Authorised Corporate Director's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Authorised Corporate Director with respect to going concern are described in the relevant sections of this report.

Other Information

The other information comprises the information included in the Annual Report other than the financial statements and our auditor's report thereon. The Authorised Corporate Director is responsible for the other information contained within the Annual Report. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon. Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinions on Other Matters Prescribed by the COLL Rules

In our opinion, based on the work undertaken in the course of the audit:

- Proper accounting records for the Company have been kept and the accounts are in agreement with those records;
- We have received all the information and explanations which, to the best of our knowledge and belief, are necessary for the purposes of our audit; and
- The information given in the Report of the Authorised Corporate Director for the year is consistent with the financial statements.

Independent Auditor's report to the shareholders of The Blu-Frog Investment Fund

(continued)

Responsibilities of the Authorised Corporate Director

As explained more fully in the Statement of the Authorised Corporate Director's responsibilities set out on page 4, the Authorised Corporate Director is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Authorised Corporate Director determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Authorised Corporate Director is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Authorised Corporate Director either intends to wind up the Company or to cease operations, or has no realistic alternative but to do so.

Auditor Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: http://www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Extent to which the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

We assessed whether the engagement team collectively had the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations by considering their experience, past performance and support available.

All engagement team members were briefed on relevant identified laws and regulations and potential fraud risks at the planning stage of the audit. Engagement team members were reminded to remain alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Company and the sector in which it operates, focusing on those provisions that had a direct effect on the determination of material amounts and disclosures in the financial statements. The most relevant frameworks we identified include:

- UK Generally Accepted Accounting Practice including Financial Reporting Standard 102 and the IA Statement of Recommended Practice for Authorised Funds;
- The Financial Conduct Authority's COLL Rules;
- The Financial Conduct Authority's Investment Funds sourcebook; and
- The Company's Prospectus.

We gained an understanding of how the Company is complying with these laws and regulations by making enquiries of the Authorised Corporate Director. We corroborated these enquiries through our review of submitted returns, external inspections, relevant correspondence with regulatory bodies and the Company's breaches register.

Independent Auditor's report to the shareholders of The Blu-Frog Investment Fund (continued)

Auditor Responsibilities for the Audit of the Financial Statements (continued)

Extent to which the audit was considered capable of detecting irregularities, including fraud (continued)

We assessed the susceptibility of the financial statements to material misstatement, including how fraud might occur, by meeting with management and those charged with governance to understand where it was considered there was susceptibility to fraud. This evaluation also considered how the Authorised Corporate Director was remunerated and whether this provided an incentive for fraudulent activity. We considered the overall control environment and how the Authorised Corporate Director oversees the implementation and operation of controls. In areas of the financial statements where the risks were considered to be higher, we performed procedures to address each identified risk. We identified a heightened fraud risk in relation to:

- Management override of controls; and
- The completeness and classification of special dividends between revenue and capital.

In addition to the above, the following procedures were performed to provide reasonable assurance that the financial statements were free of material fraud or error:

- Reviewing the level of and reasoning behind the Company's procurement of legal and professional services;
- Performing audit work procedures over the risk of management override of controls, including testing of journal entries and other adjustments for appropriateness, evaluating the business rationale of significant transactions outside the normal course of business, review of a pre sign-off Net Asset Valuation (NAV) statement for any unexpected activity and reviewing judgements made by the Authorised Corporate Director in its calculation of accounting estimates for potential management bias;
- Using a third-party independent data source to assess the completeness of the special dividend population and determining whether special dividends recognised were revenue or capital in nature with reference to the underlying circumstances of the investee companies' dividend payments;
- Assessing the Company's compliance with the key requirements of the Collective Investment Schemes sourcebook, Investment Funds sourcebook and its Prospectus;
- Completion of appropriate checklists and use of our experience to assess the Company's compliance with the IA Statement of Recommended Practice for Authorised Funds; and
- Agreement of the financial statement disclosures to supporting documentation.

Our audit procedures were designed to respond to the risk of material misstatements in the financial statements, recognising that the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve intentional concealment, forgery, collusion, omission or misrepresentation. There are inherent limitations in the audit procedures performed and the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely we would become aware of it.

Use of Our Report

This report is made solely to the Company's shareholders, as a body, in accordance with Rule 4.5.12 of the COLL Rules issued by the Financial Conduct Authority under the Open-Ended Investment Companies Regulations 2001. Our audit work has been undertaken so that we might state to the Company's shareholders those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Johnston Carmichael LLP Chartered Accountants Statutory Auditor Bishop's Court 29 Albyn Place Aberdeen AB10 1YL 6 September 2024

Accounting policies of The Blu-Frog Investment Fund

for the year ended 31 May 2024

a Basis of accounting

The financial statements have been prepared under the historical cost convention, as modified by the revaluation of investments. They have been prepared in accordance with FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland ('FRS 102') and in accordance with the Statement of Recommended Practice for UK Authorised Funds ('the SORP') published by The Investment Association in May 2014 and amended in June 2017, and the requirements of the Collective Investment Schemes sourcebook ('COLL') and the Investment Funds sourcebook ('FUND').

The ACD has considered a detailed assessment of the Fund's ability to meet its liabilities as they fall due, including liquidity, declines in global capital markets and investor redemption levels. Based on this assessment, the Fund continues to be open for trading and the ACD is satisfied the Fund has adequate financial resources to continue in operation for at least the next 12 months and accordingly it is appropriate to adopt the going concern basis in preparing the financial statements.

b Valuation of investments

The purchases and sales of investments are included up to close of business on the last business day of the accounting year.

Purchases and sales of investments are recognised when a legally binding and unconditional right to obtain, or an obligation to deliver an asset arises.

The quoted investments of the Fund have been valued at the global closing bid-market prices excluding any accrued interest in the case of debt securities ruling on the principal markets on which the stocks are quoted on the last business day of the accounting year.

Collective investment schemes are valued at the bid price for dual priced funds and at the single price for single priced funds and are valued at their most recent published price prior to the close of business valuation on 31 May 2024.

Derivatives are valued at the price which would be required to close out the contract at the balance sheet date.

c Foreign exchange

The base currency of the Fund is UK sterling which is taken to be the Fund's functional currency.

All transactions in foreign currencies are converted into sterling at the rates of exchange ruling at the dates of such transactions. The resulting exchange differences are disclosed in note 2 of the Notes to the financial statements.

Any foreign currency assets and liabilities at the end of the accounting period are translated at the exchange rate prevailing at the balance sheet date.

d Revenue

Revenue is recognised in the Statement of total return on the following basis:

Dividends from quoted equity instruments and non equity shares are recognised as revenue, net of attributable tax credits on the date when the securities are quoted ex-dividend.

Overseas dividends are recognised as revenue gross of any withholding tax and the tax consequences are recognised within the tax expense.

Distributions from collective investment schemes are recognised as revenue on the date the securities are quoted ex-dividend. Equalisation on distributions from collective investment schemes is deducted from the cost of the investment and does not form part of the Fund's distribution.

Distributions from collective investment schemes which are re-invested on behalf of the Fund are recognised as revenue on the date the securities are quoted ex-dividend and form part of the Fund's distribution.

Excess reportable income from reporting offshore funds is recognised as revenue when the reported distribution rate is available and forms part of the Fund's distribution.

Compensation is treated as either revenue or capital in nature depending on the facts of each particular case.

Accounting policies of The Blu-Frog Investment Fund (continued)

for the year ended 31 May 2024

d Revenue (continued)

Special dividends are treated as either revenue or a repayment of capital depending on the facts of each particular case.

Interest on bank deposits and short term deposits is recognised on an accruals basis.

Interest on debt securities is recognised on an accruals basis, taking into account the effective yield on the investment. Accrued interest purchased and sold on interest bearing securities is excluded from the capital cost of these securities and dealt with as part of the revenue of the Fund. The effective yield is a calculation that amortises any discount or premium on the purchase of an investment over its remaining life based on estimated cash flows. The amortised amounts form part of the distributable revenue and are calculated at each month end.

e Expenses

All expenses, other than those relating to the purchase and sale of investments, are charged to revenue on an accrual basis.

Bank interest paid is charged to revenue.

f Taxation

Tax payable on profits is recognised as an expense in the period in which profits arise. The tax effects of tax losses available to carry forward are recognised as an asset when it is probable that future taxable profits will be available, against which these losses can be utilised.

UK corporation tax is provided as amounts to be paid/recovered using the tax rates and laws that have been enacted at the balance sheet date.

Deferred taxation is provided in full on timing differences that result in an obligation at 31 May 2024 to pay more or less tax, at a future date, at rates expected to apply when they crystallise based on current rates and tax laws. Timing differences arise from the inclusion of items of income and expenditure in taxation computations in periods different from those in which they are included in the financial statements. Deferred tax assets and liabilities are not discounted.

Provision for deferred tax assets are only made to the extent the timing differences are expected to be of future benefit.

All foreign dividend revenue is recognised as a gross amount which includes any withholding tax deducted at source. Where foreign tax is withheld in excess of the applicable treaty rate a tax debtor is recognised to the extent that the overpayment is considered recoverable.

g Efficient Portfolio Management

Where appropriate, certain permitted instruments such as derivatives or forward currency contracts may be used for Efficient Portfolio Management purposes. Where such instruments are used to protect or enhance revenue, the revenue or expenses derived therefrom are included in the Statement of total return as revenue related items and form part of the distribution. Where such instruments are used to protect or enhance capital, the gains and losses derived therefrom are included in the Statement of total return as capital related items.

h Dilution levy

The need to charge a dilution levy will depend on the volume of sales or redemptions. The ACD may charge a discretionary dilution levy on the sale and redemption of shares if, in its opinion, the existing shareholders (for sales) or remaining shareholders (for redemptions) might otherwise be adversely affected, and if charging a dilution levy is, so far as practicable, fair to all shareholders and potential shareholders. Please refer to the Prospectus for further information.

i Distribution policies

i Basis of distribution

The distribution policy is to distribute all available revenue after deduction of expenses payable from revenue. Distributions attributable to income shares are paid to shareholders.

ii Unclaimed distributions

Distributions to shareholders outstanding after 6 years are taken to the capital property of the Fund.

iii Revenue

All revenue is included in the final distribution with reference to policy d.

Accounting policies of The Blu-Frog Investment Fund (continued)

for the year ended 31 May 2024

- i Distribution policies (continued)
- iv Expenses

Expenses incurred against the revenue of the Fund are included in the final distribution, subject to any expense which may be transferred to capital for the purpose of calculating the distribution, with reference to policy e.

v Equalisation

Group 2 shares are shares purchased on or after the previous XD date and before the current XD date. Equalisation applies only to group 2 shares. Equalisation is the average amount of revenue included in the purchase price of group 2 shares and is refunded to holders of these shares as a return of capital. Being capital it is not liable to income tax in the hands of the shareholders but must be deducted from the cost of shares for capital gains tax purposes. Equalisation per share is disclosed in the Distribution table.

Investment Manager's report

Investment performance*

For the period 1 June 2023 to 31 May 2024, the Fund returned 16.60%. This can be compared with the UK Consumer Price Index +3% benchmark which returned 5.05%.

Investment activities

Given the extremely strong performance of NVIDIA over the period, we have trimmed the position a number of times in order to manage single stock risk, firstly at the end of May 2023. Proceeds were used to add to existing position in Thermo Fisher Scientific and S&P Global as well as initiate on Zoetis, an animal healthcare company operating within a particularly high growth segment of the industry. In August we sold Estée Lauder following concerns around their reliance on China for future growth which exposed more deep-rooted issues within their supply chain with a turnaround unlikely in the near future, proceeds were used to bring Zoetis to a full-sized position.

Later in the period we closed positions in Tencent Holdings and Vestas Wind Systems as we felt the prior was too exposed to political risk in China and we do not believe the volatility is worth the potential returns, whilst in the onshore wind in which Vestas Wind Systems operates, there is an indication that production has already peaked with issues surrounding permits and grid connections making future growth prospects largely unknown. Proceeds were used to initiate new positions in Accenture and Intuitive Surgical with both companies set to see considerable benefits from the adoption of Artificial Intelligence ('AI') with the latter recently announcing the launch of a new robotic surgery system creating a replacement cycle which will be a tailwind for the stock. We initiated a position in RWE where we felt the undue fall in the share price had offered an attractive entry opportunity and in October we sold FANUC using the proceeds to buy NIKE, where weakness following a destoking cycle offered an attractive opportunity.

More recently, we bought positions in GE HealthCare Technologies, Apple and Roper Technologies. GE HealthCare Technologies was spun off from General Electric last year; the company is a leading supplier of radiology equipment set to benefit from the independence afforded by the spin off. We have long felt Apple was too expensive however in recent months a pullback in the stock combined with an expected bumper new iPhone cycle offers an opportunity. Roper Technologies develops and operates vertical software and technology enabled products for a wide range of high-end businesses giving it a defensive earnings profile. Funds came from the sale of American Tower and Samsung SDI, where we see limited upside in the short to medium term given the higher-for-longer rhetoric surrounding rates and prefer the fundamentals of NVIDIA and Taiwan Semiconductor Manufacturing ADR within the semiconductor space.

Investment strategy and outlook**

The period was dominated by contrasting forces with continued concerns over higher-for-longer inflation and interest rates weakening markets, whilst enthusiasm over AI led to a rally for any stocks linked to that theme. This led to greatly divergent performance across the market, which was led almost exclusively by 7 companies, the so-called 'Magnificent Seven', with NVIDIA, up a staggering 225% over the period. The year so far has led to a broadening out of markets in a positive direction.

Despite inflation peaking in late 2022 it remains above the long term average with interest rates rising aggressively before being paused in August. Markets remained uncertain, strongly linked to interest rate expectations, as demonstrated by the rally last summer on expectations of a pause in the autumn, followed by a reversal as concerns shifted to rates remaining higher, before then rallying once more as focus turned to the timing of the first rate cut. This myopic focus has fallen away in the first quarter of 2024 with companies once again rewarded for the fundamental growth they produced. This has helped to create a stronger foundation for the market, which is good news going in a year which will undoubtedly be influenced heavily by global geopolitics.

Evelyn Partners Investment Management LLP 21 June 2024

*Source: Evelyn Partners Fund Solutions Limited, based on the mid price at 10pm as at 31 May 2024 and FE fundinfo. **Source: Refinitiv.

Summary of portfolio changes for the year ended 31 May 2024

The following represents the total purchases and major sales in the year to reflect a clearer picture of the investment activities.

	Cost
Purchases:	£
Zoetis	771,392
Accenture	601,555
Intuitive Surgical	559,398
NIKE	556,154
WS Amati Investment Funds - WS Amati UK Listed Smaller Companies Fund	474,683
GE HealthCare Technologies	470,145
RWE	421,619
Shopify	242,297
Scottish Mortgage Investment Trust	240,745
Roper Technologies	228,881
Apple	202,755
S&P Global	78,902
Thermo Fisher Scientific	78,249
Adyen	13,424
	Proceeds
Sales:	£
NVIDIA	687,062
Tencent Holdings	560,819
NIKE	504,197
American Tower	494,775
UK Treasury Gilt 0.125% 31/01/2024	491,057
FANUC	443,377
Adyen	368,848
Vestas Wind Systems	355,428
Samsung SDI	343,817
Estée Lauder	315,334
Scottish Mortgage Investment Trust	279,939
Adobe	274,079
CRH	223,725
Shopify	201,054
TotalEnergies	156,566
Ferrari	152,406
London Stock Exchange Group	129,239
Goldman Sachs Funds - Goldman Sachs India Equity Portfolio	113,603
Bank of America	85,169
Microsoft	46,484

Portfolio statement

as at 31 May 2024

	Nominal value or	Market value	% of total net assets
Investment	holding	£	
Debt Securities 0.00% (1.96%) Aa3 to A1 0.00% (1.96%)		-	-
Equities 90.31% (89.58%) Equities - United Kingdom 16.44% (19.99%) Equities - incorporated in the United Kingdom 13.70% (15.41%) Energy 4.13% (3.57%) Shell	38,635	1,086,223	4.13
Materials 1.50% (2.34%) Croda International	8,695	394,753	1.50
Consumer Staples 1.59% (2.34%) Diageo	15,965	419,880	1.59
Health Care 3.62% (3.83%) AstraZeneca	7,825	953,554	3.62
Financials 2.86% (3.33%) London Stock Exchange Group	8,210	752,036	2.86
Total equities - incorporated in the United Kingdom		3,606,446	13.70
Equities - incorporated outwith the United Kingdom 2.74% (4.58%) Industrials 2.74% (2.37%)			
Experian	19,990	721,039	2.74
Communication Services 0.00% (2.21%)		-	-
Total equities - incorporated outwith the United Kingdom		721,039	2.74
Total equities - United Kingdom		4,327,485	16.44
Equities - Europe 25.63% (25.03%) Equities - Denmark 0.00% (1.99%)		-	-
Equities - France 7.73% (7.88%)			
LVMH Moët Hennessy Louis Vuitton Schneider Electric	1,070 4,395	670,392 851,232	2.55 3.23
TotalEnergies	4,373	512,356	1.95
Total equities - France	0,770	2,033,980	7.73
Equities - Germany 1.34% (0.00%) RWE	11,835	352,588	1.34
Equities - Ireland 4.53% (2.38%)			
Accenture	2,255	500,184	1.90
CRH	11,295	691,028	2.63
Total equities - Ireland		1,191,212	4.53

Portfolio statement (continued)

as at 31 May 2024

	Nominal value or	Market value	% of total net assets
Investment	holding	£	
Equities (continued) Equities - Europe (continued) Equities - Netherlands 8.34% (9.91%)			
Airbus	6,305	838,015	3.18
Ferrari	2,465	786,917	2.99
Heineken	7,310	572,558	2.17
Total equities - Netherlands		2,197,490	8.34
Equities - Switzerland 3.69% (2.87%) Chubb	4,565	971,837	3.69
Total equities - Europe		/ 7/7 107	25.72
Total equilies - Europe		6,747,107	25.63
Equities - United States 45.08% (37.42%)			
Adobe	1,285	448,842	1.71
Alphabet 'A'	6,385	865,024	3.29
Amazon.com	6,740	934,029	3.55
Apple	1,385	209,371	0.79
Bank of America	15,420	484,691	1.84
GE HealthCare Technologies	6,825	418,120	1.59
Intuitive Surgical	2,000	631,857	2.40
McDonald's	2,952	600,671	2.28
Microsoft	3,680	1,200,249	4.56
NVIDIA	1,475	1,270,409	4.83
Roper Technologies	545	228,115	0.87
S&P Global	1,890	634,631	2.41
Stryker	3,560	952,828	3.62
Thermo Fisher Scientific	1,535	684,879	2.60
UnitedHealth Group	1,705	664,524	2.52
Visa	4,450	952,773	3.62
Zoetis	5,145	685,475	2.60
Total equities - United States		11,866,488	45.08
Equities - Far East 3.16% (7.14%) Equities - Japan 0.00% (2.28%)		-	-
Equities - South Korea 0.00% (2.51%)		-	-
Equities - Taiwan 3.16% (2.35%)			
Taiwan Semiconductor Manufacturing ADR	7,015	832,742	3.16
Total equities - Far East		832,742	3.16
Total equities		23,773,822	90.31

Portfolio statement (continued)

as at 31 May 2024

Investment	Nominal value or holding	Market value £	% of total net assets
Collective Investment Schemes 7.29% (5.15%)			
UK Authorised Collective Investment Schemes 3.32% (1.49%)			
WS Amati Investment Funds - WS Amati UK Listed Smaller Companies Fund	69,615	872,763	3.32
Offshore Collective Investment Schemes 3.97% (3.66%)			
Goldman Sachs Funds - Goldman Sachs India Equity Portfolio	36,915	1,046,540	3.97
Total collective investment schemes		1,919,303	7.29
Forward currency contracts 0.00% (-0.04%)		-	-
Portfolio of investments		25,693,125	97.60
Other net assets		630,880	2.40
Total net assets		26,324,005	100.00

All investments are listed on recognised stock exchanges and are approved securities or regulated collective investment schemes within the meaning of the FCA rules unless otherwise stated.

The comparative figures in brackets are as at 31 May 2023.

United Kingdom equities are grouped in accordance with Global Industry Classification Standard ('GICS').

GICS was developed by and is the exclusive property and a service mark of MSCI Inc. ('MSCI') and Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ('S&P') and is licensed for use by Evelyn Partners Services Limited. Neither MSCI, S&P nor any third party involved in making or compiling the GICS or any GICS classifications makes any express or implied warranties or representations with respect to such standard or classification (or the results to be obtained by the use thereof), and all such parties hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability and fitness for a particular purpose with respect to any of such standard or classification. Without limiting any of the foregoing, in no event shall MSCI, S&P, any of their affiliates or any third party involved in making or compiling the GICS or any GICS classifications have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

Risk and reward profile*

The risk and reward indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area in the table below shows the Fund's ranking on the risk and reward indicator.

	Typical	ly lower re	wards,	Typically higher rewards			ewards,	
•		lower risk			higher risk			
	1	2	3	4	5	6	7	

The Fund is in a higher category because the price of its investments have risen or fallen frequently and more dramatically than some other types of investment. The category shown is not guaranteed to remain unchanged and may shift over time. Even the lowest category does not mean a risk-free investment.

For full details on risk factors for the Fund, please refer to the Prospectus.

There have been no changes to the risk and reward indicator in the year.

^{*} As per the KIID published on 25 March 2024.

Comparative table

The following disclosures give a shareholder an indication of the performance of a share in the Fund. It also discloses the operating charges and direct transaction costs applied to each share. Operating charges are those charges incurred in operating the Fund and direct transaction costs are costs incurred when purchasing or selling securities in the portfolio of investments.

	2024	2023	2022
Net Income Shares	р	р	р
Change in net assets per share			
Opening net asset value per share	2,119.80	1,999.98	2,192.12
Return before operating charges	374.35	149.89	(165.09)
Operating charges	(21.44)	(22.66)	(25.68)
Return after operating charges *	352.91	127.23	(190.77)
$Distributions^{\wedge}$	(13.29)	(7.41)	(1.37)
Closing net asset value per share	2,459.42	2,119.80	1,999.98
* after direct transaction costs of:	0.78	0.48	1.49
Performance			
Return after charges	16.65%	6.36%	(8.70%)
Other information			
Closing net asset value (£)	26,324,005	24,798,266	22,952,127
Closing number of shares	1,070,334	1,169,839	1,147,619
Operating charges ^{^^}	0.95%	1.13%	1.15%
Direct transaction costs	0.03%	0.02%	0.07%
Published prices			
Highest share price	2,514	2,139	2,401
Lowest share price	2,073	1,859	1,962

Investments carry risk. Past performance is not a guide to future performance. Investors may not get back the amount invested.

^ Rounded to 2 decimal places.

^^ The operating charges are represented by the Ongoing Charges Figure ('OCF'). The OCF consists principally of the ACD's periodic charge and the Investment Manager's fee which are included in the annual management charge, but also includes the costs for other services paid. It is indicative of the charges which may occur in a year as it is calculated on historical data.

The OCF includes expenses incurred by underlying holdings of collective investment schemes in relation to the Fund (the synthetic 'OCF').

Financial statements - The Blu-Frog Investment Fund

Statement of total return for the year ended 31 May 2024

	Notes	202	4	202	3
		£	£	£	£
Income:					
Net capital gains	2		3,738,476		1,443,281
Revenue	3	394,325		360,124	
Expenses	4	(226,038)		(253,799)	
Net revenue before taxation		168,287		106,325	
Taxation	5	(22,790)		(19,048)	
Net revenue after taxation		-	145,497	_	87,277
Total return before distributions			3,883,973		1,530,558
Distributions	6		(145,497)		(87,273)
Change in net assets attributable to shareholders		-		_	
from investment activities		=	3,738,476	=	1,443,285

Statement of change in net assets attributable to shareholders for the year ended 31 May 2024

	2024		2023	
	£	£	£	£
Opening net assets attributable to shareholders		24,798,266		22,952,127
Amounts receivable on issue of shares	-		679,583	
Amounts payable on cancellation of shares	(2,212,737)		(276,729)	<u>.</u>
		(2,212,737)		402,854
Change in net assets attributable to shareholders				
from investment activities		3,738,476		1,443,285
Closing net assets attributable to shareholders		26,324,005		24,798,266

Balance sheet

as at 31 May 2024

	Notes	2024 £	2023 £
Assets:		du	ىلە
Fixed assets:			
Investments		25,693,125	23,981,956
Current assets:			
Debtors	7	29,240	478,053
Cash and cash equivalents	8	1,235,238	504,741
Total assets		26,957,603	24,964,750
Liabilities:			
Investment liabilities		-	(9,008)
Creditors:			
Distribution payable		(99,552)	(81,947)
Other creditors	9	(534,046)	(75,529)
Total liabilities		(633,598)	(166,484)
Net assets attributable to shareholders		26,324,005	24,798,266

Notes to the financial statements

for the year ended 31 May 2024

Accounting policies The accounting policies are disclosed on pages 13 to 15.

2.	Net capital gains	2024	2023
		£	£
	Non-derivative securities - realised gains	401,391	1,385,265
	Non-derivative securities - movement in unrealised gains	3,260,065	193,206
	Currency losses	(51,563)	(25,313)
	Forward currency contracts gains / (losses)	129,800	(109,367)
	Compensation	2	-
	Transaction charges	(1,219)	(510)
	Total net capital gains	3,738,476	1,443,281
3.	Revenue	2024	2023
		£	£
	UK revenue	110,891	95,883
	Unfranked revenue	1,020	239
	Overseas revenue	253,039	244,468
	Interest on debt securities	6,622	314
	Bank and deposit interest	22,753	19,220
	Total revenue	394,325	360,124
4.	Expenses	2024	2023
		£	£
	Payable to the ACD and associates		
	Annual management charge*	205,100	234,172
	Payable to the Depositary		
	Depositary fees	9,014	9,000
		/,014	/,000
	Other expenses:		
	Audit fee	8,700	7,560
	Non-executive directors' fees	1,631	1,614
	Safe custody fees	637	684
	Bank interest	355	18
	FCA fee	143	251
	KIID production fee	458	500
		11,924	10,627
	Total expenses	226,038	253,799
5.	Taxation	2024	2023
		£	£
	a. Analysis of the tax charge for the year		
	Overseas tax withheld	22,790	19,048
	Total taxation (note 5b)	22,790	19,048
	· · · ·	<u>.</u>	

* The annual management charge is 0.82% and includes the ACD's periodic charge and the Investment Manager's fee.

for the year ended 31 May 2024

5. Taxation (continued)

b. Factors affecting the tax charge for the year

The tax assessed for the year is lower (2023: lower) than the standard rate of UK corporation tax for an authorised collective investment scheme of 20% (2023: 20%). The differences are explained below:

	2024	2023
	£	£
Net revenue before taxation	168,287	106,325
Corporation tax @ 20%	33,657	21,265
Effects of:		
UK revenue	(22,178)	(19,176)
Overseas revenue	(47,539)	(45,898)
Overseas tax withheld	22,790	19,048
Excess management expenses	36,060	43,809
Total taxation (note 5a)	22,790	19,048

c. Provision for deferred taxation

At the year end, a deferred tax asset has not been recognised in respect of timing differences relating to excess management expenses as there is insufficient evidence that the asset will be recovered. The amount of asset not recognised is £501,392 (2023: £465,332).

6. Distributions

7.

Recoverable income tax

Total debtors

The distributions take account of revenue added on the issue of shares and revenue deducted on the cancellation of shares, and comprise:

	2024	2023
	£	£
Interim income distribution	43,709	4,814
Final income distribution	99,552	81,947
	143,261	86,761
Equalisation:		
Amounts deducted on cancellation of shares	2,236	807
Amounts added on issue of shares	-	(295)
Total net distributions	145,497	87,273
Reconciliation between net revenue and distributions:		
Net revenue after taxation per Statement of total return	145,497	87,277
Undistributed revenue brought forward	3	(1)
Undistributed revenue carried forward	(3)	(3)
Distributions	145,497	87,273
Details of the distribution per share are disclosed in the Distribu	ution table.	
Debtors	2024	2023
	£	£
Sales awaiting settlement	-	450,736
Accrued revenue	19,536	24,825
Recoverable overseas withholding tax	9,117	2,442
Prepaid expenses	333	-
	054	50

254

29,240

50

478,053

for the year ended 31 May 2024

8. Cash and cash equivalents		2024	2023
		£	£
Total cash and cash equive	alents	1,235,238	504,741
9. Other creditors		2024	2023
		£	£
Amounts payable on cance	ellation of shares	49,133	65,968
Purchases awaiting settlem	ent	474,683	-
Currency trades outstandin	g	-	253
Other expenses:			
Safe custody fees		414	125
Audit fee		8,700	7,560
Non-executive directors' fe	ees	574	1,366
FCA fee		27	44
KIID production fee		-	208
Transaction charges		515	5
Total accrued expenses		10,230	9,308
Total other creditors		534,046	75,529

10. Commitments and contingent liabilities

At the balance sheet date there are no commitments or contingent liabilities.

11. Share classes

The following reflects the change in shares in issue in the year:

	Net Income Shares
Opening shares in issue	1,169,839
Total shares cancelled in the year	(99,505)
Closing shares in issue	1,070,334

Further information in respect of the return per share is disclosed in the Comparative table.

12. Related party transactions

Evelyn Partners Fund Solutions Limited, as ACD is a related party due to its ability to act in respect of the operations of the Fund.

The ACD acts as principal in respect of all transactions of shares in the Fund. The aggregate monies received and paid through the creation and cancellation of shares are disclosed in the Statement of change in net assets attributable to shareholders of the Fund.

Amounts payable to the ACD and its associates are disclosed in note 4.

The Investment Manager, Evelyn Partners Investment Management LLP is a related party to the ACD as they are within the same corporate body.

13. Events after the balance sheet date

Subsequent to the year end, the net asset value per net income share has increased from 2,459p to 2,539p as at 30 August 2024. This movement takes into account routine transactions but also reflects the market movements of recent months.

for the year ended 31 May 2024

14. Transaction costs

a Direct transaction costs

Direct transaction costs include fees and commissions paid to agents, advisers, brokers and dealers; levies by regulatory agencies and security exchanges; and transfer taxes and duties.

Commission is a charge which is deducted from the proceeds of the sale of securities and added to the cost of the purchase of securities. This charge is a payment to agents, advisers, brokers and dealers in respect of their services in executing the trades.

Tax is payable on the purchase of securities in the United Kingdom. It may be the case that 'other taxes' will be charged on the purchase of securities in countries other than the United Kingdom.

The total purchases and sales and the related direct transaction costs incurred in these transactions are as follows:

$\begin{array}{cccccccccccccccccccccccccccccccccccc$		Purchases before transaction costs	Commi	ission	Taxe	əs	Finan transact		Purchases after transaction costs
Closed-Ended Funds 239,546 - - 1,199 0.50% - - 474,683 Collective Investment Schemes* 473,689 2,111 0.05% 1,199 0.50% - - 474,683 Total 4,936,889 2,111 0.05% 1,199 0.50% - - 474,683 Total 4,936,889 2,111 0.05% 1,199 0.50% - - 4,74,0199 Purchases before Furchases transaction Financi Financi fifter fransaction costs 789 0.04% 2,338 0.13% 1,562 0.09% 1,801,059 Bonds* 1,796,370 789 0.04% 2,338 0.13% 1,562 0.09% 1,801,059 Bonds* 1,796,370 789 0.04% 2,338 0.13% 1,562 0.09% 2,285,759 Total 2,281,070 789 0.04% 2,338 0.13% 1,562 0.09% 2,285,759 Zotal	2024	£	£	%	£	%	£	%	£
$ \begin{array}{ c c c c c c } \hline Collective Investment Schemes* \\ \hline Total & 473,683 & - & - & - & - & - & - & - & - & 4,94,019 \\ \hline Purchases & - & - & - & - & - & - & - & - & - & $	Equities	4,222,660	2,111	0.05%	-	-	-	-	4,224,771
Total 4,936,889 2,111 0.05% 1,199 0.50% - - 4,940,199 Purchases before Purchases Financial Financial Financial transaction costs Commission Taxes financial transaction costs 2023 £ £ %	Closed-Ended Funds	239,546	-	-	1,199	0.50%	-	-	240,745
$ \begin{array}{c c c c c c c c c c c c c c c c c c c $	Collective Investment Schemes*	474,683	-	-	-	-	-	-	474,683
before transaction before costs Commission Taxes Financial transaction after transaction 2023 £ £ % <td>Total</td> <td>4,936,889</td> <td>2,111</td> <td>0.05%</td> <td>1,199</td> <td>0.50%</td> <td>-</td> <td>-</td> <td>4,940,199</td>	Total	4,936,889	2,111	0.05%	1,199	0.50%	-	-	4,940,199
Equities 1,796,370 789 0.04% 2,338 0.13% 1,562 0.09% 1,81,059 Bonds* 484,700 - - - - - 484,700 Total 2,281,070 789 0.04% 2,338 0.13% 1,562 0.09% 2,285,759 Sales Sales before 5ales	-	before transaction	Commi	ission	Ταχ	əs			after transaction
Bonds* Total 484,700 - - - - - 484,700 1otal 2,281,070 789 0.04% 2,338 0.13% 1,562 0.09% 2,285,759 Sales	2023	£	£	%	£	%	£	%	£
Total 2.281.070 789 0.04% 2.338 0.13% 1.562 0.09% 2.285.759 Sales before transaction costs Sales before Sales Sales before Sales Sales differ Sales differ 2024 £ £ % £ 127.124	Equities	1,796,370	789	0.04%	2,338	0.13%	1,562	0.09%	1,801,059
$\frac{1.2c1,0c2}{cont} = \frac{1.0c1}{cont} = $		484,700	-	-	-	-	-	-	484,700
before transaction costs Commission Taxes financial transaction t	Total	2,281,070	789	0.04%	2,338	0.13%	1,562	0.09%	2,285,759
2024 \pounds \pounds $\%$ \pounds ϕ <th< td=""><td></td><td>before transaction</td><td>Commi</td><td>ission</td><td>Taxe</td><td>əs</td><td></td><td></td><td>after transaction</td></th<>		before transaction	Commi	ission	Taxe	əs			after transaction
Equities 6,012,955 (4,620) 0.08% (737) 0.01% - - 6,007,598 Closed-Ended Funds 279,941 - - (2) 0.00% - - 279,939 Bonds* 491,057 - - - - - 491,057 Collective Investment Schemes* 127,124 - - - - 127,124 Total 6,911,077 (4,620) 0.08% (739) 0.01% - - 491,057 Sales 5ales 5ales 5ales 5ales 5ales after transaction transaction costs costs Commission Tax=s Financial \$ \$ 2023 £ % £ % £ % \$<	2024	£			£	%			£
Closed-Ended Funds 279,941 - - (2) 0.00% - - 279,939 Bonds* 491,057 - - - - - 491,057 Collective Investment Schemes* 127,124 - - - - 127,124 Total 6,911,077 (4,620) 0.08% (739) 0.01% - 6,905,718 Sales Sales Sales safter safter safter fransaction costs Commission Taxes Sales after 2023 £ % £ % £ % £ % £ Equities 2,273,962 (860) 0.04% (51) 0.00% - - 2,273,051 Collective Investment Schemes* 44,049 - - - - - 44,049	Equities	6,012,955	(4,620)	0.08%	(737)	0.01%	-		
Bonds* 491,057 - - - - - 491,057 Collective Investment Schemes* 127,124 - - - - - 127,124 Total 6,911,077 (4,620) 0.08% (739) 0.01% - - 6,905,718 Sales Sales sales safter safter fransaction fransaction ransaction costs Commission Taxes Financial fransaction costs costs £ % £ % £ % £ % £ % £ % £ % £ % £ % £ 2,273,051 Collective Investment Schemes* 44,049 - - - - - 44,049	•		-	-	. ,		-	-	
Collective Investment Schemes* 127,124 - - - - - 127,124 Total 6,911,077 (4,620) 0.08% (739) 0.01% - - 6,905,718 Sales Sales before - Financial Sales safter Counting Commission Taxes Financial transaction costs 2023 £ % £ % £ % £ Equities 2,273,962 (860) 0.04% (51) 0.00% - - 2,273,051 Collective Investment Schemes* 44,049 - - - - - 44,049	Bonds*	491,057	-	-	. ,	-	-	-	491,057
Sales Sales Sales before ransaction Financial transaction costs Commission Taxes transaction tax costs 2023 £ £ % £ % £ Equities 2,273,962 (860) 0.04% (51) 0.00% - - 2,273,051 Collective Investment Schemes* 44,049 - - - - 44,049	Collective Investment Schemes*	127,124	-	-	-	-	-	-	127,124
before transaction Costs 2023 £ Equities 2,273,962 (860) 0.04% (51) 0.00% - - - - - - - - - - - - -	Total	6,911,077	(4,620)	0.08%	(739)	0.01%	-	-	6,905,718
Equities 2,273,962 (860) 0.04% (51) 0.00% - - 2,273,051 Collective Investment Schemes* 44,049 - - - - 44,049	-	before transaction	Commi	ission	Ταχ	es			after transaction
Equities 2,273,962 (860) 0.04% (51) 0.00% - - 2,273,051 Collective Investment Schemes* 44,049 - - - - 44,049	2023	£	£	%	£	%	£	%	£
Collective Investment Schemes* 44,049 44,049	Equities	2,273,962	(860)	0.04%	(51)	0.00%	-		
	Collective Investment Schemes*		-	-	. ,	-	-	-	
	Total	2,318,011	(860)	0.04%	(51)	0.00%	-	-	2,317,100

Capital events amount of \pounds nil (2023: \pounds 11,747) is excluded from the total sales as there were no direct transaction costs charged in these transactions.

* No direct transaction costs were incurred in these transactions.

for the year ended 31 May 2024

14. Transaction costs (continued)

- a Direct transaction costs (continued)
 - Summary of direct transaction costs

The following represents the total of each type of transaction cost, expressed as a percentage of the Fund's average net asset value in the year:

2024	£	% of average net asset value
Commission	6,731	0.03%
Taxes	1,938	0.00%
2023	£	% of average net asset value
Commission	1,649	0.01%
Taxes	2,389	0.01%
Financial transaction tax	1,562	0.00%

b Average portfolio dealing spread

The average portfolio dealing spread is calculated as the difference between the bid and offer value of the portfolio as a percentage of the offer value.

The average portfolio dealing spread of the investments at the balance sheet date was 0.07% (2023: 0.09%).

15. Risk management policies

In pursuing the Fund's investment objective, as set out in the Prospectus, the following are accepted by the ACD as being the main risks from the Fund's holding of financial instruments, either directly or indirectly through its underlying holdings. These are presented with the ACD's policy for managing these risks. To ensure these risks are consistently and effectively managed these are continually reviewed by the risk committee, a body appointed by the ACD, which sets the risk appetite and ensures continued compliance with the management of all known risks.

a Market risk

Market risk is the risk that the value of the Fund's financial instruments will fluctuate as a result of changes in market prices and comprise three elements: other price risk, currency risk, and interest rate risk.

(i) Other price risk

The Fund's exposure to price risk comprises mainly of movements in the value of investment positions in the face of price movements.

The main elements of the portfolio of investments exposed to this risk are equities and collective investment schemes.

This risk is generally regarded as consisting of two elements: stock specific risk and market risk. Through these two factors, the Fund is exposed to price fluctuations, which are monitored by the ACD in pursuance of the investment objective and policy.

Adhering to investment guidelines and avoiding excessive exposure to one particular issuer can limit stock specific risk. Subject to compliance with the investment objective of the Fund, spreading exposure in the portfolio of investments both globally and across sectors or geography can mitigate market risk.

At 31 May 2024, if the price of the investments held by the Fund increased or decreased by 5%, with all other variables remaining constant, then the net assets attributable to shareholders of the Fund would increase or decrease by approximately £1,284,656 (2023: £1,174,835).

for the year ended 31 May 2024

- 15. Risk management policies (continued)
- a Market risk (continued)
- (ii) Currency risk

Currency risk is the risk that the value of investments or future cash flows will fluctuate as a result of exchange rate movements. Investment in overseas securities or holdings of foreign currency cash will provide direct exposure to currency risk as a consequence of the movement in foreign exchange rates against sterling. Investments in UK securities investing in overseas securities will give rise to indirect exposure to currency risk. These fluctuations can also affect the profitability of some UK companies, and thus their market prices, as sterling's relative strength or weakness can affect export prospects, the value of overseas earnings in sterling terms, and the prices of imports sold in the UK.

Forward currency contracts may be used to manage the portfolio exposure to currency movements.

Forward currency contracts are used to help the Fund achieve its investment objective as stated in the Prospectus. The ACD monitors the exposure to these contracts to ensure they are in keeping with the investment objective.

The foreign currency risk profile of the Fund's financial instruments and cash holdings at the balance sheet date is as follows:

Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
£	£	£
4,584,058	8,546	4,592,604
14,171,251	20,265	14,191,516
18,755,309	28,811	18,784,120
Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
£	£	£
493,603	1,733	495,336
4,413,155	709	4,413,864
547,420	4,216	551,636
565,765	5,789	571,554
623,291	-	623,291
10,567,171	465,096	11,032,267
17,210,405	477,543	17,687,948
	instruments and cash holdings £ 4,584,058 14,171,251 18,755,309 Financial instruments and cash holdings £ 493,603 4,413,155 547,420 565,765 623,291 10,567,171	instruments and cash holdings Net debtors and creditors £ £ 4,584,058 8,546 14,171,251 20,265 18,755,309 28,811 Financial instruments and cash holdings Net debtors and creditors £ £ 493,603 1,733 4,413,155 709 547,420 4,216 565,765 5,789 623,291 - 10,567,171 465,096

At 31 May 2024, if the value of sterling increased or decreased by 5% against all other currencies, with all other variables remaining constant, then the net assets attributable to shareholders of the Fund would increase or decrease by approximately £939,206 (2023: £618,764).

(iii) Interest rate risk

Interest rate risk is the risk that the value of the Fund's investments will fluctuate as a result of interest rate changes.

During the year the Fund's direct exposure to interest rates consisted of cash and bank balances and interest bearing securities. The amount of revenue receivable from floating rate securities and bank balances or payable on bank overdrafts will be affected by fluctuations in interest rates. In the event of a change in interest rates, there would be no material impact upon the net assets of the Fund. The Fund would not in normal market conditions hold significant cash balances and would have limited borrowing capabilities as stipulated in the COLL rules. Derivative contracts are not used to hedge against the exposure to interest rate risk.

There is no exposure to interest bearing securities at the balance sheet date.

for the year ended 31 May 2024

- 15. Risk management policies (continued)
- a Market risk (continued)
- (iii) Interest rate risk (continued)

The interest rate risk profile of financial assets and liabilities at the balance sheet date 2023 is as follows:

	Variable rate financial assets	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
2023	£	£	£	£	£
Danish krone	-	-	495,336	-	495,336
Euro	-	-	4,413,864	-	4,413,864
Hong Kong dollar	-	-	551,636	-	551,636
Japanese yen	-	-	571,554	-	571,554
Korean won	-	-	623,291	-	623,291
UK sterling	504,741	485,250	6,277,550	(157,223)	7,110,318
US dollar	-	-	11,041,528	(9,261)	11,032,267
	504,741	485,250	23,974,759	(166,484)	24,798,266

b Credit risk

This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. This includes counterparty risk.

The Depositary has appointed the custodian to provide custody services for the assets of the Fund. There is a counterparty risk that the custodian could cease to be in a position to provide custody services to the Fund. The Fund's investments (excluding cash) are ring fenced hence the risk is considered to be negligible.

The Fund holds cash and cash deposits with financial institutions which potentially exposes the Fund to counterparty risk. The credit rating of the financial institution is taken into account so as to minimise the risk to the Fund of default.

Holdings in collective investment schemes are subject to direct credit risk. The exposure to pooled investment vehicles is unrated.

c Liquidity risk

A significant risk is the cancellation of shares which investors may wish to sell and that securities may have to be sold in order to fund such cancellations if insufficient cash is held at the bank to meet this obligation. If there were significant requests for the redemption of shares at a time when a large proportion of the portfolio of investments were not easily tradable due to market volumes or market conditions, the ability to fund those redemptions would be impaired and it might be necessary to suspend dealings in shares in the Fund.

Investments in smaller companies at times may prove illiquid, as by their nature they tend to have relatively modest traded share capital. Shifts in investor sentiment, or the announcement of new price sensitive information, can provoke significant movement in share prices, and make dealing in any quantity difficult.

The Fund may also invest in securities that are not listed or traded on any stock exchange. In such situations the Fund may not be able to immediately sell such securities.

To reduce liquidity risk the ACD will ensure, in line with the limits stipulated within the COLL rules, a substantial portion of the Fund's assets consist of readily realisable securities. This is monitored on a monthly basis and reported to the Risk Committee together with historical outflows of the Fund.

In addition liquidity is subject to stress testing on an annual basis to assess the ability of the Fund to meet large redemptions, while still being able to adhere to its objective guidelines and the FCA investment borrowing regulations.

All of the financial liabilities are payable on demand.

for the year ended 31 May 2024

- 15. Risk management policies (continued)
- d Fair value of financial assets and financial liabilities

There is no material difference between the value of the financial assets and liabilities, as shown in the balance sheet, and their fair value.

To ensure this, the fair value pricing committee is a body appointed by the ACD to analyse, review and vote on price adjustments/maintenance where no current secondary market exists and/or where there are potential liquidity issues that would affect the disposal of an asset. In addition, the committee may also consider adjustments to the Fund's price should the constituent investments be exposed to closed markets during general market volatility or instability.

Investment assets	Investment liabilities
2024	2024
£	£
23,773,822	-
1,919,303	-
	-
25,693,125	-
Investment assets	Investment liabilities
2023	2023
£	£
22,703,106	-
1,278,850	(9,008)
	-
23,981,956	(9,008)
	assets 2024 £ 23,773,822 1,919,303 - 25,693,125 Investment assets 2023 £ 22,703,106 1,278,850 -

No securities in the portfolio of investments are valued using valuation techniques.

e Assets subject to special arrangements arising from their illiquid nature

There are no assets held in the portfolio of investments which are subject to special arrangements arising from their illiquid nature.

f Derivatives

The Fund may employ derivatives with the aim of reducing the Fund's risk profile, reducing costs or generating additional capital or revenue, in accordance with Efficient Portfolio Management.

The ACD monitors that any exposure is covered globally to ensure adequate cover is available to meet the Fund's total exposure, taking into account the value of the underlying investments, any reasonably foreseeable market movement, counterparty risk, and the time available to liquidate any positions.

In the year there was direct exposure to derivatives. On a daily basis, exposure is calculated in UK sterling using the commitment approach with netting applied where appropriate. The total global exposure figure is divided by the net asset value of the Fund to calculate the percentage global exposure. Global exposure is a risk mitigation technique that monitors the overall commitment to derivatives in the Fund at any given time and may not exceed 100% of the net asset value of the property of the Fund.

For certain derivative transactions cash margins may be required to be paid to the brokers with whom the trades were executed and settled. These balances are subject to daily reconciliations and are held by the broker in segregated cash accounts that are afforded client money protection.

Derivatives may be used for investment purposes and as a result could potentially impact upon the risk factors outlined above.

for the year ended 31 May 2024

- 15. Risk management policies (continued)
- f Derivatives (continued)
- (i) Counterparties

Transactions in securities give rise to exposure to the risk that the counterparties may not be able to fulfil their responsibility by completing their side of the transaction. This risk is mitigated by the Fund using a range of brokers for security transactions, thereby diversifying the risk of exposure to any one broker. In addition the Fund will only transact with brokers who are subject to frequent reviews with whom transaction limits are set.

The Fund may transact in derivative contracts which potentially exposes the Fund to counterparty risk from the counterparty not settling their side of the contract. Transactions involving derivatives are entered into only with investment banks and brokers with appropriate and approved credit rating, which are regularly monitored. Forward currency transactions are only undertaken with the custodians appointed by the Depositary.

At the balance sheet date, there are no securities in the portfolio of investments subject to a repurchase agreement.

(ii) Leverage

The leverage is calculated as the exposure generated through the use of derivatives (calculated in accordance with the commitment approach) divided by the net asset value.

There have been no leveraging arrangements in the year.

(iii) Global exposure

Global exposure is a measure designed to limit the leverage generated by a fund through the use of financial derivative instruments, including derivatives with embedded assets.

At the balance sheet date there is no global exposure to derivatives.

There have been no collateral arrangements in the year.

Distribution table

for the year ended 31 May 2024

Interim distribution in pence per share

Group 1 - Shares purchased before 1 June 2023

Group 2 - Shares purchased 1 June 2023 to 30 November 2023

	Net		Total distribution	Total distribution
	revenue	Equalisation	31 January 2024	31 January 2023
Net Income Shares				
Group 1	3.989	-	3.989	0.407
Group 2	1.652	2.337	3.989	0.407

Final distribution in pence per share

Group 1 - Shares purchased before 1 December 2023

Group 2 - Shares purchased 1 December 2023 to 31 May 2024

	Net		Total distribution	Total distribution
	revenue	Equalisation	30 September 2024	30 September 2023
Net Income Shares				
Group 1	9.301	-	9.301	7.005
Group 2	9.301	-	9.301	7.005

Equalisation

Equalisation applies only to group 2 shares. It is the average amount of revenue included in the purchase price of group 2 shares and is refunded to holders of these shares as a return of capital. Being capital it is not liable to income tax in the hands of the shareholders but must be deducted from the cost of shares for capital gains tax purposes.

Remuneration

Remuneration code disclosure

The remuneration committee is responsible for setting the remuneration policy for all partners, directors and employees within Evelyn Partners Group Limited ('the Group'), including individuals designated as Material Risk Takers (MRTs) under the Remuneration Code. The remuneration policy is designed to be compliant with the Code and provides a framework to attract, retain, motivate and reward partners, directors and employees. The overall policy is designed to promote the long-term success of the group and to support prudent risk management, with particular attention to conduct risk.

Remuneration committee

The remuneration committee report contained in the Group Report and Financial Statements for the year ended 31 December 2023 includes details on the remuneration policy. The remuneration committee comprises five non-executive directors¹ and is governed by formal terms of reference, which are reviewed and agreed by the board. The committee met eight times during 2023.

Remuneration policy

The main principles of the remuneration policy are:

- to align remuneration with the strategy and performance of the business;
- to ensure that remuneration is set at an appropriate and competitive level taking into account market rates and practices;
- to foster and support conduct and behaviours which are in line with our culture and values;
- to maintain a sound risk management framework;
- to ensure that the ratio between fixed and variable remuneration is appropriate and does not encourage excessive risk taking;
- to comply with all relevant regulatory requirements; and
- to align incentive plans with the business strategy and shareholder interests.

The policy is designed to reward partners, directors and employees for delivery of both financial and non-financial objectives which are set in line with company strategy. As part of a "balanced scorecard" approach to variable remuneration non-financial criteria including, but not limited to, compliance and risk issues, client management, supervision, leadership and teamwork are considered alongside financial performance.

Remuneration systems

The committee reviews all partners' and directors' fixed and variable remuneration. In addition, it approves hurdles and awards in respect of equity incentive plans, namely a Deferred Option Plan, Equity Matching Plan, Matching Share Plan, Executive Long Term Incentive Plan and an Investment Management Long Term Incentive Plan.

The remuneration of partners is made up of a fixed profit share, discretionary bonus profit share and non-discretionary bonus profit share. The remuneration of employees typically comprises of a salary with benefits including pension contribution, life assurance, permanent health insurance, private medical insurance, SAYE scheme and a discretionary bonus scheme. Partners, directors and associate directors are also eligible to participate, at the invitation of the committee, in the equity incentive plans described above.

When setting variable remuneration for the executive directors, the committee considers overall business profit for the group and divisions, achievement of both financial and non-financial objectives (including adherence to the principles of treating customers fairly, conduct risk, compliance and regulatory rules), personal performance and any other relevant policy of the board in respect of the year ended 31 December 2023. The committee agrees the individual allocation of variable remuneration and the proportion of that variable remuneration to be awarded as restricted shares.

¹ Please note that the data provided for the independent non-executive directors is as at 31 December 2023. The data provided is for independent non-executive directors only.

Remuneration (continued)

Aggregate quantitative information

The total amount of remuneration paid by Evelyn Partners Fund Solutions Limited ('EPFL') is nil as EPFL has no employees. However, a number of employees have remuneration costs recharged to EPFL and the annualised remuneration for these 72 employees is £3.51 million of which £3.23 million is fixed remuneration. This is based on the salary and benefits for those identified as working in EPFL as at 31 December 2023. Any variable remuneration is awarded for the year ended 31 December 2023. This information excludes any senior management or other Material Risk Takers (MRTs) whose remuneration information is detailed below.

The Group reviews its MRTs at least annually. These individuals are employed by and provide services to other companies in the Group. It is difficult to apportion remuneration for these individuals in respect of their duties to EPFL. For this reason, the aggregate total remuneration awarded for the year 2023 for senior management and other MRTs detailed below has not been apportioned.

Table to show the aggregate remuneration split by Senior Management and other MRTs for EPFL	For the pe	eriod 1 Janu	ary 2023 to 3	l Decemb	er 2023
		Variable	Variable		
	Fixed	Cash	Equity	Total	No. MRTs
	£'000	£'000	£'000	£'000	
Senior Management	3,518	1,662	-	5,180	18
Other MRTs	919	848	-	1,767	5
Total	4,437	2,510	-	6,947	23

Investment Manager

The ACD delegates the management of the Company's portfolio of assets to Evelyn Partners Investment Management LLP and pays to the Investment Manager, out of the annual management charge, a monthly fee calculated on the total value of the portfolio of investments at the month end. Evelyn Partners Investment Management LLP are compliant with the Capital Requirements Directive regarding remuneration and therefore their staff are covered by remuneration regulatory requirements.

Further information

Distributions and reporting dates

Where net revenue is available it will be distributed semi-annually on 30 September (final) and 31 January (interim). In the event of a distribution, shareholders will receive a tax voucher.

XD dates:	1 June 1 December	final interim
Reporting dates:	31 May 30 November	annual interim

Buying and selling shares

The property of the Fund is valued at 10pm on the 15th day and the last business day of the month, except where the 15th is not a business day when it shall be the next business day thereafter, with the exception of any bank holiday in England and Wales or the last business day prior to those days annually, where the valuation may be carried out at a time agreed in advance between the ACD and the Depositary and prices of shares are calculated as at that time. Share dealing is on a forward basis i.e. investors can buy and sell shares at the next valuation point following receipt of the order.

Prices of shares and the estimated yield of the Fund are published on the following website: www.trustnet.com or may be obtained by calling 0141 222 1151.

Benchmark

Shareholders may compare the performance of the Company against the UK Consumer Price Index +3%.

The ACD has selected this comparator benchmark as it reflects the absolute returns above inflation.

The benchmark is not a target for the Company, nor is the Company constrained by the benchmark.

Appointments

ACD and Registered office Evelyn Partners Fund Solutions Limited 45 Gresham Street London EC2V 7BG Telephone 0207 131 4000 Authorised and regulated by the Financial Conduct Authority

Administrator and Registrar Evelyn Partners Fund Solutions Limited 177 Bothwell Street Glasgow G2 7ER Telephone 0141 222 1151 (Registration) 0141 222 1150 (Dealing) Authorised and regulated by the Financial Conduct Authority

Directors of the ACD Andrew Baddeley Brian McLean Mayank Prakash Neil Coxhead Independent Non-Executive Directors of the ACD Dean Buckley Linda Robinson Victoria Muir Sally Macdonald

Non-Executive Directors of the ACD Paul Wyse - resigned 11 July 2023 Guy Swarbreck - appointed 21 August 2023

Investment Manager Evelyn Partners Investment Management LLP 45 Gresham Street London EC2V 7BG Authorised and regulated by the Financial Conduct Authority

Depositary NatWest Trustee and Depositary Services Limited House A, Floor 0 Gogarburn 175 Glasgow Road Edinburgh EH12 1HQ Authorised and regulated by the Financial Conduct Authority

Auditor Johnston Carmichael LLP Bishop's Court 29 Albyn Place Aberdeen AB10 1YL