

The Staffordshire Portfolio

Annual Report

for the year ended 31 March 2024

Contents

Page

Report of the Authorised Corporate Director	2
Statement of the Authorised Corporate Director's responsibilities	3
Assessment of Value - The Staffordshire Portfolio	4
Report of the Depositary to the shareholders of The Staffordshire Portfolio	8
Independent Auditor's report to the shareholders of The Staffordshire Portfolio	9
Accounting policies of The Staffordshire Portfolio	12
Investment Manager's report	15
Summary of portfolio changes	17
Portfolio statement	18
Risk and reward profile	22
Comparative table	23
Financial statements:	
Statement of total return	24
Statement of change in net assets attributable to shareholders	24
Balance sheet	25
Notes to the financial statements	26
Distribution table	37
Remuneration	38
Further information	40
Appointments	41

The Staffordshire Portfolio

Report of the Authorised Corporate Director ('ACD')

Evelyn Partners Fund Solutions Limited, as ACD, presents herewith the Annual Report for The Staffordshire Portfolio for the year ended 31 March 2024.

The Staffordshire Portfolio ('the Company' or 'the Fund') is an authorised open-ended investment company with variable capital ('ICVC') further to an authorisation order dated 6 June 2002. The Company is incorporated under registration number IC000179. 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 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 Fund is to enhance total return and provide long-term growth. Whilst income is of secondary importance, there will be semi-annual distributions.

The Investment Manager's policy is to achieve this objective through a portfolio of UK and international equities, bonds and cash as appropriate.

The Fund will also have the power to invest in other collective investment schemes and money market instruments. Additionally it may invest in derivative and forward transactions, but only for the purposes of efficient management of the portfolio. The Investment Manager does not envisage entering into hedging transactions to a major extent. The Investment Manager can also invest in immovables (real property).

The assets of the Fund will be invested with the aim of achieving the investment objective set out above and must be invested so as to comply with the investment and borrowing powers and restrictions set out in the COLL Sourcebook, the Instrument and this Prospectus.

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 40.

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
26 July 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 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 Staffordshire Portfolio

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 Staffordshire Portfolio ('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 March 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 Staffordshire Portfolio (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 quality of marketing material sent to shareholders and the dealing and settlement arrangements. 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, Close Asset Management Limited 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 objective of the Fund is to enhance total return and provide long-term growth. Whilst income is of secondary importance, there will be semi-annual distributions.

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 Staffordshire Portfolio (continued)

2. Performance (continued)

Benchmark (continued)

The benchmark for the Fund is the ARC Sterling Steady Growth PCI, 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 29 February 2024 (%)

	Currency	1 year	3 years	5 years
ARC Sterling Steady Growth PCI TR in GB	GBP	5.87	8.20	23.40
The Staffordshire Portfolio TR in GB	GBX	4.87	13.27	33.71

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 the recommended investment period of five years and observed that it had outperformed its comparator benchmark, ARC Sterling Steady Growth PCI.

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?

There were no follow-up actions required.

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 Investment Manager's fee, ACD's periodic charge, Depositary/ Custody fees and audit 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?

Both the Investment Manager's fee and the ACD's periodic charge are on a fixed percentage charge meaning there are no opportunities for savings going forward should the Fund grow in size.

The ancillary charges of the Fund represent 17 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 September 2023.

Assessment of Value - The Staffordshire Portfolio (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 1.19%² was more expensive than those of similar externally managed funds.

The Fund does not have a performance fee and 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 was no further action required as the Board were of the opinion that no element within the OCF gave any cause for concern.

The Board recognised that the costs associated with a fund of this size would lead to a higher than normal OCF, which resulted in the amber rating last year and the amber will likely continue while the Fund size remains similar.

6. Comparable Services

What was assessed in this section?

The Board compared the Investment Manager's 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 Manager's fee compared favourably with other EPFL administered funds displaying similar characteristics.

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 raised in section 5, the Board concluded that The Staffordshire Portfolio had provided value to shareholders.

Dean Buckley

Chairman of the Board of Evelyn Partners Fund Solutions Limited

12 May 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.

² Figure calculated at interim report, 30 September 2023.

Report of the Depositary to the shareholders of The Staffordshire Portfolio

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

26 July 2024

Independent Auditor's report to the shareholders of The Staffordshire Portfolio

Opinion

We have audited the financial statements of The Staffordshire Portfolio (the 'Company') for the year ended 31 March 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 March 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 Staffordshire Portfolio (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 3, 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's 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.

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.

Independent Auditor's report to the shareholders of The Staffordshire Portfolio (continued)

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

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

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
26 July 2024

Accounting policies of The Staffordshire Portfolio

for the year ended 31 March 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 March 2024.

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.

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.

Accounting policies of The Staffordshire Portfolio (continued)

for the year ended 31 March 2024

d Revenue (continued)

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 then 50% of these expenses on an accrual basis are reallocated to capital, net of any tax effect.

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 March 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.

Accounting policies of The Staffordshire Portfolio (continued)
for the year ended 31 March 2024

i *Distribution policies (continued)*

iii *Revenue*

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

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*

During the 12 months under review the share price of The Staffordshire Portfolio (capital only) rose 5.20% from 314.8p to 331.3p on a mid-price basis. Over the same period the ARC Sterling Steady Growth PCI Total Return benchmark was 9.29%. The stated objective for The Staffordshire Portfolio is to seek total return over the long-term; the Investment Manager's policy is to achieve this objective through a portfolio of UK and international equities, bonds, cash, and alternative investments as appropriate. The gross estimated portfolio yield is in the region of 1.70%.

Investment activities*

The investment environment has remained challenging with equity markets very much climbing the wall of worry over the last 12 months and seemingly disregarding geopolitical turmoil, concerns over the banking sector, higher core inflation and a flattening out of global economic growth. Central Banks began the process of raising interest rates at the start of the period under review and it was hoped that 12 months on inflation would be under control allowing a pivot towards a more dovish monetary policy. However, core inflation has failed to retreat as fast as had been anticipated, which coupled together with buoyant employment data, has meant that Central Banks have had to adopt a 'higher for longer' approach. Within the Fund we switched the exposure to United States Treasury Inflation Indexed Bonds 1.75% 15/01/2028 into the UK Treasury Gilt 0.5% 22/10/2061 bond. This was trading at 28p and will redeem at par at 100p; making the yield to maturity very attractive as we anticipate inflation returning to trend levels before redemption.

We wrote in the last report that we were becoming more defensively minded due to the narrow leadership of equity markets and conversely more favourably inclined towards Fixed Income assets; however bond returns have continued to lag those of major equity markets. Higher interest rates have continued to impact highly leveraged businesses, in contrast those companies with strong balance sheets and exposure to all engrossing themes such as Artificial Intelligence ('AI') and appetite suppressants ('GLPs') have soared with the 'Magnificent 7' (Alphabet 'A', Apple, Amazon.com, Meta Platforms, NVIDIA, Netflix and Tesla) driving equity market returns, assisted by Eli Lilly (purchased in the Fund) and Novo Nordisk the major players in the growing diabetes and anti-obesity market.

At the start of the period under review we were concerned about the likelihood of a US recession (as rates moved higher) and as a result took some profits in the mega cap US technology exposure with sales of Cisco Systems, Activision Blizzard (following the takeover by Microsoft) and Amazon.com although as the news around AI and Amazon Web Services changed, the latter was bought back into the Fund. We also trimmed core holdings such as Adobe, Apple and Alphabet 'A' into considerable strength and switched Check Point Software Technologies into Palo Alto Networks, the leading global cybersecurity company, as we feel this better reflects the positive demand cycle affecting this sector. More recently, as we became more constructive on equities, we have added Nasdaq and ServiceNow to the portfolio to diversify our exposure to Information Technology ('IT') spending and AI trends. Nasdaq is a financial technology company providing trading, clearing, exchange technology, listing and information services to companies and investors; most known for the main technology index, Nasdaq is highly exposed to secular growth yet has durable and repeatable revenues. In the UK we have also purchased exposure to London Stock Exchange Group for the same reasons with both purchases financed from the sale of Deutsche Boerse. ServiceNow is the 7th largest (by market cap) software business yet with a growth rate twice that of its peer group. Effectively their software allows for workflow optimisation automating labour intensive tasks in business areas such as IT, Human Resources, Legal and Marketing making their software and aftersales essential for operational efficiency.

In contrast to the US we see much better value in markets such as the UK and Europe and have purchased new holdings in RELX, Whitbread, DCC and Rightmove. RELX (formerly Reed Elsevier) provides analytical solutions and information to improve decision making and improve efficiency in sectors including Scientific, Technical & Medical, Risk & Business analytics and Legal. They also run exhibitions for businesses. Whitbread own brands such as Beefeater and Premier Inn, the leading UK hotel brand which is benefitting from increased inbound tourism into the UK, while Rightmove is the leading online residential real estate platform. DCC is an Irish investment conglomerate that provides solutions to the distribution of energy (both fossil fuels and renewables), healthcare and technology.

*Source: Close Asset Management Limited.

Investment Manager's report (continued)

Investment activities* (continued)

In order to fund new purchases we have further reduced exposure to some of the long-term technology winners and have also consolidated some of the underperforming investments such as SSP Group, Gresham House Energy Storage Fund, Anglo American, Fidelity China Special Situations and Asia Dragon. Profits have also been taken in BAE Systems which has been a major beneficiary of the increased defence spending as a result of the war in Ukraine. Whilst we think this is a long-term structural change, and we would look to repurchase on any weakness, the shares have run up hard. Likewise we took profits in BlackRock Gold & General Fund after a rally in the gold price. We have a 6% holding in Gold through WisdomTree Physical Gold and again feel that there is a structural change to demand for the yellow metal as a hedge against geopolitical turmoil, inflation, the dollar and loose monetary policy.

Other sales have included Barings UK Unit Trust Funds - Barings Europe Select Trust, Zoetis, and Becton Dickinson. The Fund also benefitted from the takeovers of Dechra Pharmaceuticals and Activision Blizzard.

Investment strategy and outlook

As we discussed in September 2023 the outlook for investment markets is incredibly opaque at this time with investors seemingly remarkably sanguine in some areas, such as the growth and proliferation of AI and the benefits of anti-obesity drugs, whilst at the same time ignoring further inflationary pressures from oil pricing and the geopolitical risks in the Middle East and the Ukraine. Later this year will see Elections in the UK, South Africa and India as well as, most importantly, Presidential Election in the US. It is likely that the incumbent parties in the UK and US will cede control to the opposition and there will be much comment as we approach the ballot box.

As a result of this, not to mention recent activity in the Middle East, we think some caution is merited in the short term. The market has settled on a central case of 'no landing' meaning that a recession will be avoided in the US and any recessions elsewhere (such as in Germany) will be relatively shallow. We will watch the economic data keenly, especially in relation to Consumer Price Index and unemployment to see if this benign environment can persist. However corporate profitability is holding up well and if the Federal Reserve (and other Central Banks) can navigate this short term volatility then we see no reason why equity markets will not continue to outperform other asset classes.

Valuations in US assets look relatively unattractive in comparison to other equity markets such as Europe and UK, but these are supported by a strong USD, better demand, pricing and cash flow generation. Elsewhere much will depend on China showing some improvement in their economic recovery as this has a direct link to global economic growth. US equities have bounced strongly from the lows seen in 2022 and a period of consolidation, as well as a broadening out of equity market returns, would be healthy for long-term investors.

The strategy for The Staffordshire Portfolio remains to focus on quality, liquidity, and flexibility; conditions are changing rapidly so we must too especially as markets always overreact on both bad and good news. There will be significant opportunities for long-term investment funds to take advantage of volatility in the coming months.

Close Asset Management Limited

18 June 2024

*Source: Close Asset Management Limited.

Summary of portfolio changes

for the year ended 31 March 2024

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

	Cost £
Purchases:	
UK Treasury Gilt 0.5% 22/10/2061	281,136
Aberdeen New Dawn Investment Trust	266,334
Palo Alto Networks	264,992
Amazon.com	232,574
RELX	200,212
Fidelity China Special Situations	194,491
Whitbread	182,213
Schneider Electric	178,709
Roche Holding	175,996
SSP Group	175,447
AIB Group	159,913
Eli Lilly	140,096
Shell	133,156
Nasdaq	130,458
DCC	129,865
Zoetis	127,551
London Stock Exchange Group	125,525
Rightmove	116,692
Dechra Pharmaceuticals	111,216
Croda International	108,556

	Proceeds £
Sales:	
Dechra Pharmaceuticals	356,339
Activision Blizzard	285,522
BAE Systems	282,097
Deutsche Boerse	266,533
Barings UK Unit Trust Funds - Barings Europe Select Trust	238,920
BlackRock Gold and General Fund	232,967
United States Treasury Inflation Indexed Bonds 1.75% 15/01/2028	232,537
Diageo	213,640
Renewables Infrastructure Group	210,294
Shell	205,679
Anglo American	203,980
Anheuser-Busch InBev	195,869
United Kingdom Inflation-Linked Gilt 1.25% 22/11/2027	194,325
Becton Dickinson	192,592
Check Point Software Technologies	190,972
Cisco Systems	183,519
Nestlé	179,845
Gresham House Energy Storage Fund	178,260
AIB Group	176,467
Fidelity China Special Situations	167,515

Portfolio statement

as at 31 March 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Debt Securities* 2.67% (3.28%)			
Aaa to Aa2 0.00% (1.78%)		-	-
Aa3 to A1 2.67% (1.50%)			
UK Treasury Gilt 0.5% 22/10/2061	£1,000,000	310,300	2.67
Equities 78.72% (69.39%)			
Equities - United Kingdom 28.91% (26.77%)			
Equities - incorporated in the United Kingdom 26.01% (24.67%)			
Energy 5.54% (4.98%)			
BP	87,500	433,738	3.73
Shell	8,000	210,000	1.81
		643,738	5.54
Materials 2.32% (3.52%)			
Croda International	5,500	269,610	2.32
Industrials 4.13% (1.92%)			
Ashtead Group	2,000	112,760	0.97
Learning Technologies Group	150,000	127,800	1.10
RELX	7,000	239,680	2.06
		480,240	4.13
Consumer Discretionary 1.57% (0.00%)			
Whitbread	5,500	182,270	1.57
Consumer Staples 2.22% (4.09%)			
Unilever	6,500	258,375	2.22
Health Care 1.38% (3.30%)			
AstraZeneca	1,500	160,170	1.38
Financials 4.97% (3.53%)			
Admiral Group	8,000	226,960	1.95
London Stock Exchange Group	1,350	128,115	1.10
Prudential	30,000	222,900	1.92
		577,975	4.97
Information Technology 0.00% (0.87%)		-	-
Communication Services 2.55% (1.16%)			
Auto Trader Group	25,000	175,050	1.51
Rightmove	22,000	120,912	1.04
		295,962	2.55

* Grouped by credit rating - source: Interactive Data and Bloomberg.

Portfolio statement (continued)
as at 31 March 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Equities (continued)			
Equities - United Kingdom (continued)			
Equities - incorporated in the United Kingdom (continued)			
Real Estate 1.33% (1.30%)			
Supermarket Income REIT	200,000	155,000	1.33
		<u>3,023,340</u>	<u>26.01</u>
Total equities - incorporated in the United Kingdom			
Equities - incorporated outwith the United Kingdom 2.90% (2.10%)			
Materials 2.90% (2.10%)			
Glencore	77,500	337,319	2.90
		<u>3,360,659</u>	<u>28.91</u>
Total equities - United Kingdom			
Equities - Europe 16.94% (14.77%)			
Equities - Belgium 0.00% (1.62%)		-	-
Equities - France 4.63% (1.67%)			
Schneider Electric	3,000	537,725	4.63
Equities - Germany 1.85% (3.51%)			
Infineon Technologies	8,000	214,594	1.85
Equities - Ireland 3.58% (1.62%)			
Accenture	930	254,731	2.19
DCC	2,800	161,224	1.39
Total equities - Ireland		<u>415,955</u>	<u>3.58</u>
Equities - Luxembourg 0.00% (0.72%)		-	-
Equities - Netherlands 4.27% (2.07%)			
ASML Holding	650	495,815	4.27
Equities - Switzerland 2.61% (3.56%)			
Roche Holding	1,500	302,755	2.61
Total equities - Europe		<u>1,966,844</u>	<u>16.94</u>

Portfolio statement (continued)

as at 31 March 2024

Investment	Nominal value or holding	Market value £	% of total net assets
Equities (continued)			
Equities - United States 32.87% (26.51%)			
Adobe	600	239,515	2.06
Alphabet 'A'	3,400	405,874	3.49
Amazon.com	2,000	285,359	2.46
Apple	1,400	190,043	1.64
Eli Lilly	300	184,393	1.59
EOG Resources	3,000	303,550	2.61
Lockheed Martin	500	179,941	1.55
McDonald's	1,000	223,075	1.92
Microsoft	1,250	415,614	3.58
Nasdaq	2,810	140,250	1.21
Palo Alto Networks	1,400	314,611	2.71
ServiceNow	90	54,261	0.47
TJX	2,200	176,505	1.52
Valero Energy	2,600	351,291	3.02
Visa	1,600	353,032	3.04
Total equities - United States		<u>3,817,314</u>	<u>32.87</u>
Equities - Israel 0.00% (1.34%)		-	-
Total equities		<u>9,144,817</u>	<u>78.72</u>
Closed-Ended Funds 7.84% (11.28%)			
Closed-Ended Funds - incorporated in the United Kingdom 2.89% (4.01%)			
Baillie Gifford Japan Trust	45,000	<u>335,250</u>	<u>2.89</u>
Closed-Ended Funds - incorporated outwith the United Kingdom 4.95% (7.27%)			
3i Infrastructure	90,000	293,400	2.52
BH Macro	85,000	<u>283,050</u>	<u>2.43</u>
Total closed-ended funds - incorporated outwith the United Kingdom		<u>576,450</u>	<u>4.95</u>
Total closed-ended funds		<u>911,700</u>	<u>7.84</u>
Collective Investment Schemes 6.10% (10.21%)			
UK Authorised Collective Investment Schemes 2.44% (6.11%)			
Thesis - TM Tellworth UK Smaller Companies Fund	225,000	<u>283,208</u>	<u>2.44</u>
Offshore Collective Investment Schemes 3.66% (4.10%)			
Schroder ISF Asian Total Return	1,000	<u>426,755</u>	<u>3.66</u>
Total collective investment schemes		<u>709,963</u>	<u>6.10</u>

Portfolio statement (continued)

as at 31 March 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Exchange Traded Commodities 6.35% (5.08%)			
WisdomTree Physical Gold	4,500	737,865	6.35
Portfolio of investments		11,814,645	101.68
Other net liabilities		(194,770)	(1.68)
Total net assets		11,619,875	100.00

All investments are listed on recognised stock exchanges or 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 March 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.

Typically lower rewards, lower risk				Typically higher rewards, 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 7 June 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
	p	p	p
Income			
Change in net assets per share			
Opening net asset value per share	313.55	327.26	305.97
Return before operating charges	23.62	(4.24)	29.58
Operating charges	(3.19)	(3.72)	(3.60)
Return after operating charges *	20.43	(7.96)	25.98
Distributions [^]	(5.36)	(5.75)	(4.69)
Closing net asset value per share	328.62	313.55	327.26
* after direct transaction costs of:	0.41	0.15	0.27
Performance			
Return after charges	6.52%	(2.43%)	8.49%
Other information			
Closing net asset value (£)	11,619,875	13,300,278	14,475,926
Closing number of shares	3,536,000	4,241,869	4,423,369
Operating charges ^{^^}	1.01%	1.19%	1.09%
Direct transaction costs	0.13%	0.05%	0.08%
Published prices			
Highest share price	330.6	325.8	348.6
Lowest share price	299.2	294.7	312.4

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 and closed ended vehicles such as investment trusts in relation to the Fund (the synthetic 'OCF'). Following guidance issued by the Investment Association on 30 November 2023, the synthetic OCF calculation no longer includes closed ended vehicles.

Financial statements - The Staffordshire Portfolio

Statement of total return for the year ended 31 March 2024

	Notes	2024		2023	
		£	£	£	£
Income:					
Net capital gains / (losses)	2		604,677		(550,379)
Revenue	3	294,453		324,044	
Expenses	4	<u>(118,914)</u>		<u>(120,336)</u>	
Net revenue before taxation		175,539		203,708	
Taxation	5	<u>(15,135)</u>		<u>(15,474)</u>	
Net revenue after taxation			<u>160,404</u>		<u>188,234</u>
Total return before distributions			765,081		(362,145)
Distributions	6		(219,621)		(248,393)
Change in net assets attributable to shareholders from investment activities			<u>545,460</u>		<u>(610,538)</u>

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

	2024		2023	
	£	£	£	£
Opening net assets attributable to shareholders		13,300,278		14,475,926
Amounts receivable on issue of shares	-		4,791	
Amounts payable on cancellation of shares	<u>(2,225,863)</u>		<u>(569,901)</u>	
		(2,225,863)		(565,110)
Change in net assets attributable to shareholders from investment activities		545,460		(610,538)
Closing net assets attributable to shareholders		<u>11,619,875</u>		<u>13,300,278</u>

Balance sheet
as at 31 March 2024

	Notes	2024 £	2023 £
Assets:			
Fixed assets:			
Investments		11,814,645	13,199,231
Current assets:			
Debtors	7	14,603	972,177
Cash and cash equivalents	8	498,028	5
Total assets		<u>12,327,276</u>	<u>14,171,413</u>
Liabilities:			
Creditors:			
Bank overdrafts	8	-	(62,579)
Distribution payable		(72,276)	(111,095)
Other creditors	9	(635,125)	(697,461)
Total liabilities		<u>(707,401)</u>	<u>(871,135)</u>
Net assets attributable to shareholders		<u>11,619,875</u>	<u>13,300,278</u>

Notes to the financial statements
for the year ended 31 March 2024

1. Accounting policies

The accounting policies are disclosed on pages 12 to 14.

2. Net capital gains / (losses)

	2024	2023
	£	£
Non-derivative securities - realised gains	681,426	558,730
Non-derivative securities - movement in unrealised losses	(59,155)	(1,100,626)
Currency losses	(15,054)	(13,554)
Capital special dividend	-	7,280
Transaction charges	(2,540)	(2,209)
Total net capital gains / (losses)	<u>604,677</u>	<u>(550,379)</u>

3. Revenue

	2024	2023
	£	£
UK revenue	114,001	139,529
Unfranked revenue	23,468	18,568
Overseas revenue	133,961	138,826
Interest on debt securities	20,377	26,098
Bank and deposit interest	2,646	1,023
Total revenue	<u>294,453</u>	<u>324,044</u>

4. Expenses

	2024	2023
	£	£
Payable to the ACD and associates		
ACD's periodic charge*	33,568	33,500
Investment Manager's fees*	<u>64,138</u>	<u>67,465</u>
	<u>97,706</u>	<u>100,965</u>
Payable to the Depositary		
Depositary fees	<u>9,018</u>	<u>9,000</u>
Other expenses:		
Audit fee	8,700	7,560
Non-executive directors' fees	1,758	1,560
Safe custody fees	648	598
Bank interest	526	-
FCA fee	100	171
KIID production fee	<u>458</u>	<u>482</u>
	<u>12,190</u>	<u>10,371</u>
Total expenses	<u>118,914</u>	<u>120,336</u>

* The annual management charge is 0.76% and includes the Manager's periodic charge and the Investment Manager's fees.

Notes to the financial statements (continued)

for the year ended 31 March 2024

5. Taxation

	2024	2023
	£	£
<i>a. Analysis of the tax charge for the year</i>		
Overseas tax withheld	15,135	15,474
Total taxation (note 5b)	<u>15,135</u>	<u>15,474</u>

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	<u>175,539</u>	<u>203,708</u>
Corporation tax @ 20%	35,108	40,742
Effects of:		
UK revenue	(22,800)	(27,906)
Overseas revenue	(26,793)	(27,766)
Overseas tax withheld	15,135	15,474
Excess management expenses	14,485	14,930
Total taxation (note 5a)	<u>15,135</u>	<u>15,474</u>

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 £194,631 (2023: £180,146).

6. Distributions

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	140,618	134,958
Final income distribution	<u>72,276</u>	<u>111,095</u>
	212,894	246,053
Equalisation:		
Amounts deducted on cancellation of shares	6,727	2,372
Amounts added on issue of shares	-	(32)
Total net distributions	<u>219,621</u>	<u>248,393</u>

Reconciliation between net revenue and distributions:

Net revenue after taxation per Statement of total return	160,404	188,234
Undistributed revenue brought forward	29	20
Expenses paid from capital	59,194	60,168
Undistributed revenue carried forward	(6)	(29)
Distributions	<u>219,621</u>	<u>248,393</u>

Details of the distribution per share are disclosed in the Distribution table.

Notes to the financial statements (continued)
for the year ended 31 March 2024

7. Debtors	2024	2023
	£	£
Sales awaiting settlement	-	949,658
Accrued revenue	5,581	16,747
Recoverable overseas withholding tax	5,391	4,504
Recoverable income tax	3,631	1,268
Total debtors	<u>14,603</u>	<u>972,177</u>
8. Cash and cash equivalents	2024	2023
	£	£
Bank balances	<u>498,028</u>	<u>5</u>
Bank overdraft	<u>-</u>	<u>(62,579)</u>
Total cash and cash equivalents	<u>498,028</u>	<u>(62,574)</u>
9. Other creditors	2024	2023
	£	£
Amounts payable on cancellation of shares	624,781	125,920
Purchases awaiting settlement	-	556,485
Currency trades outstanding	-	282
Accrued expenses:		
Payable to the ACD and associates		
ACD's periodic charge	275	-
Investment management fees	<u>505</u>	<u>5,707</u>
	780	5,707
Other expenses:		
Depositary fees	74	-
Safe custody fees	162	111
Audit fee	8,700	7,560
Non-executive directors' fees	491	1,156
KIID production fee	83	125
Transaction charges	<u>54</u>	<u>115</u>
	9,564	9,067
Total accrued expenses	<u>10,344</u>	<u>14,774</u>
Total other creditors	<u>635,125</u>	<u>697,461</u>

10. Commitments and contingent liabilities

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

Notes to the financial statements (continued)

for the year ended 31 March 2024

11. Share classes

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

	Income
Opening shares in issue	4,241,869
Total shares cancelled in the year	(705,869)
Closing shares in issue	<u>3,536,000</u>

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 amount due to the ACD and its associates at the balance sheet date is disclosed in note 9.

13. Events after the balance sheet date

Subsequent to the year end, the net asset value per income share has increased from 328.62p to 341.58p as at 15 July 2024. This movement takes into account routine transactions but also reflects the market movements of recent months.

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:

	Purchases before transaction costs	Commission		Taxes		Financial transaction tax		Purchases after transaction costs
	£	£	%	£	%	£	%	£
2024								
Equities	3,501,286	1,661	0.05%	11,450	0.33%	-	-	3,514,397
Closed-Ended Funds	330,357	132	0.04%	1,503	0.45%	-	-	331,992
Bonds*	281,136	-	-	-	-	-	-	281,136
Total	<u>4,112,779</u>	<u>1,793</u>	<u>0.09%</u>	<u>12,953</u>	<u>0.78%</u>	<u>-</u>	<u>-</u>	<u>4,127,525</u>

* No direct transaction costs were incurred in these transactions.

Notes to the financial statements (continued)

for the year ended 31 March 2024

14. Transaction costs (continued)

a Direct transaction costs (continued)

	Purchases before transaction costs	Commission		Taxes		Financial transaction tax		Purchases after transaction costs
	£	£	%	£	%	£	%	£
2023								
Equities	1,728,735	769	0.04%	2,945	0.17%	-	-	1,732,449
Closed-Ended Funds	1,106,171	267	0.02%	1,115	0.10%	-	-	1,107,553
Bonds*	436,858	-	-	-	-	-	-	436,858
Collective Investment Schemes*	217,378	-	-	-	-	-	-	217,378
Total	3,489,142	1,036	0.06%	4,060	0.27%	-	-	3,494,238

	Sales before transaction costs	Commission		Taxes		Financial transaction tax		Sales after transaction costs
	£	£	%	£	%	£	%	£
2024								
Equities	4,204,836	(1,519)	0.04%	(3)	0.00%	(1)	0.00%	4,203,313
Closed-Ended Funds	823,313	(357)	0.04%	(5)	0.00%	-	-	822,951
Bonds*	426,862	-	-	-	-	-	-	426,862
Collective Investment Schemes*	613,353	-	-	-	-	-	-	613,353
Total	6,068,364	(1,876)	0.08%	(8)	0.00%	(1)	0.00%	6,066,479

	Sales before transaction costs	Commission		Taxes		Financial transaction tax		Sales after transaction costs
	£	£	%	£	%	£	%	£
2023								
Equities	3,059,164	(1,396)	0.05%	(6)	0.00%	-	-	3,057,762
Closed-Ended Funds	208,765	(80)	0.04%	(3)	0.00%	-	-	208,682
Bonds*	195,989	-	-	-	-	-	-	195,989
Collective Investment Schemes*	149,377	-	-	-	-	-	-	149,377
Exchange Traded Commodities*	71,238	-	-	-	-	-	-	71,238
Total	3,684,533	(1,476)	0.09%	(9)	0.00%	-	-	3,683,048

Capital events amount of £86,943 (2023: £5) 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.

Notes to the financial statements (continued)

for the year ended 31 March 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	3,669	0.03%
Taxes	12,961	0.10%
Financial transaction tax	1	0.00%

2023	£	% of average net asset value
Commission	2,512	0.02%
Taxes	4,069	0.03%

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 0.10% (2023: 0.08%).

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, collective investment schemes, closed-ended funds and exchange traded commodities.

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 March 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 £575,217 (2023: £638,188).

Notes to the financial statements (continued)

for the year ended 31 March 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.

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
2024	£	£	£
Euro	1,248,134	2,847	1,250,981
Swiss franc	302,755	-	302,755
US dollar	4,072,050	5,478	4,077,528
Total foreign currency exposure	5,622,939	8,325	5,631,264

	Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
2023	£	£	£
Euro	1,179,444	1,822	1,181,266
Swiss franc	474,490	-	474,490
US dollar	4,155,415	10,143	4,165,558
Total foreign currency exposure	5,809,349	11,965	5,821,314

At 31 March 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 £281,563 (2023: £291,066).

(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. The value of interest bearing securities may be affected by changes in the interest rate environment, either globally or locally. 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.

Notes to the financial statements (continued)

for the year ended 31 March 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 is as follows:

	Variable rate financial assets	Variable rate financial liabilities	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
	£	£	£	£	£	£
2024						
Euro	-	-	-	1,250,981	-	1,250,981
Swiss franc	-	-	-	302,755	-	302,755
UK sterling	498,023	-	310,300	5,887,689	(707,401)	5,988,611
US dollar	5	-	-	4,077,523	-	4,077,528
	<u>498,028</u>	<u>-</u>	<u>310,300</u>	<u>11,518,948</u>	<u>(707,401)</u>	<u>11,619,875</u>

	Variable rate financial assets	Variable rate financial liabilities	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
	£	£	£	£	£	£
2023						
Euro	-	-	-	1,261,566	(80,300)	1,181,266
Swiss franc	-	-	-	474,490	-	474,490
UK sterling	199,306	(62,579)	-	8,150,792	(808,555)	7,478,964
US dollar	236,168	-	-	3,997,967	(68,577)	4,165,558
	<u>435,474</u>	<u>(62,579)</u>	<u>-</u>	<u>13,884,815</u>	<u>(957,432)</u>	<u>13,300,278</u>

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 and issuer 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.

In addition to the interest rate risk, bond investments are exposed to issuer risk which reflects the ability for the bond issuer to meet its obligations to pay interest and return the capital on the redemption date. Change in issuer risk will change the value of the investments and is dealt with further in note 15a. The debt securities held within the portfolio are investment grade bonds. A breakdown is provided in the Portfolio statement. The credit quality of the debt securities is disclosed in the Portfolio statement.

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.

Notes to the financial statements (continued)

for the year ended 31 March 2024

15. Risk management policies (continued)

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.

The equity markets of emerging countries tend to be more volatile than the more developed markets of the world. Standards of disclosure and accounting regimes may not always fully comply with international criteria, and can make it difficult to establish accurate estimates of fundamental value. The dearth of accurate and meaningful information, and inefficiencies in its distribution, can leave emerging markets prone to sudden and unpredictable changes in sentiment. The resultant investment flows can trigger significant volatility in these relatively small and illiquid markets. At the same time, this lack of liquidity, together with low dealing volumes, can restrict the ACD's ability to execute substantial deals.

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.

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.

Notes to the financial statements (continued)

for the year ended 31 March 2024

15. Risk management policies (continued)

d Fair value of financial assets and financial liabilities (continued)

	Investment assets	Investment liabilities
Basis of valuation	2024	2024
	£	£
Quoted prices	11,104,682	-
Observable market data	709,963	-
Unobservable data	-	-
	<u>11,814,645</u>	<u>-</u>
	Investment assets	Investment liabilities
Basis of valuation	2023	2023
	£	£
Quoted prices	11,840,878	-
Observable market data	1,358,353	-
Unobservable data	-	-
	<u>13,199,231</u>	<u>-</u>

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.

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.

During the year there were no derivative transactions.

(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.

Notes to the financial statements (continued)

for the year ended 31 March 2024

15. Risk management policies (continued)

f Derivatives (continued)

(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 March 2024

Interim distribution in pence per share

Group 1 - Shares purchased before 1 April 2023

Group 2 - Shares purchased 1 April 2023 to 30 September 2023

	Net revenue	Equalisation	Total distribution 30 November 2023	Total distribution 30 November 2022
Income				
Group 1	3.315	-	3.315	3.135
Group 2	3.315	-	3.315	3.135

Final distribution in pence per share

Group 1 - Shares purchased before 1 October 2023

Group 2 - Shares purchased 1 October 2023 to 31 March 2024

	Net revenue	Equalisation	Total distribution 31 July 2024	Total distribution 31 July 2023
Income				
Group 1	2.044	-	2.044	2.619
Group 2	2.044	-	2.044	2.619

Remuneration

Remuneration code disclosure

The remuneration committee is responsible for setting the remuneration policy for all partners, directors and employees within the Evelyn Partners Group Limited ('the Group'), including individuals designated as Material Risk Takers 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 directors and is governed by formal terms of reference, which are reviewed and agreed by the board. The committee met eight times during 2023¹.

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 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.

Evelyn Partners 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 financial 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 period 1 January 2023 to 31 December 2023			
		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 has appointed Close Asset Management Limited to provide investment management and related advisory services to the ACD. Close Asset Management Limited are paid a monthly fee out of the scheme property of The Staffordshire Portfolio which is calculated on the total value of the portfolio of investments at each valuation point. Close Asset Management Limited are compliant with the Capital Requirements Directive regarding remuneration and therefore Close Asset Management Limited 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 31 July (final) and 30 November (interim). In the event of a distribution, shareholders will receive a tax voucher.

XD dates:	1 April	final
	1 October	interim
Reporting dates:	31 March	annual
	30 September	interim

Buying and selling shares

The property of the Fund is valued at 12 noon on the 14th day of each month (or, if such day is not a business day, on the next business day) and on the last business day of each month, 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 ARC Sterling Steady Growth PCI. Comparison of the Company's performance against this benchmark will give shareholders an indication of how the Company is performing against an index based on the real performance numbers delivered to discretionary private clients by participating Investment Managers.

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

Close Asset Management Limited
10 Crown Place
London EC2A 4FT
Authorised and regulated by the Financial Conduct Authority

Depository

NatWest Trustee and Depository 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