

**VT BROMPTON FUNDS ICVC  
(FORMERLY KNOWN AS VT GROSVENOR FUNDS ICVC)**

**(Sub-funds VT Brompton Cautious Fund (formerly known as VT Grosvenor Cautious Fund) and VT Brompton Adventurous Fund (formerly known as VT Grosvenor Adventurous Fund))**

**Annual Report and Financial Statements  
For the year ended 31 December 2022**

## CONTENTS

---

|                                                                                                                                                   | <b>Page</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Company Overview                                                                                                                                  | 1           |
| Statement of the Authorised Corporate Director's (ACD's) Responsibilities                                                                         | 2           |
| Statement of the Depositary's Responsibilities and Report of the Depositary to the Shareholders of VT Brompton Funds ICVC                         | 3           |
| Independent Auditor's Report to the Shareholders of VT Brompton Funds ICVC (Sub-funds VT Brompton Cautious Fund and VT Brompton Adventurous Fund) | 4           |
| Accounting policies                                                                                                                               | 7           |
| <br>                                                                                                                                              |             |
| <b>VT Brompton Cautious Fund</b>                                                                                                                  |             |
| Sub-fund Overview                                                                                                                                 | 8           |
| Investment Manager's Review                                                                                                                       | 10          |
| Performance Record                                                                                                                                | 11          |
| Portfolio Summary                                                                                                                                 | 13          |
| Summary of Material Portfolio Changes                                                                                                             | 14          |
| Statement of Total Return                                                                                                                         | 15          |
| Statement of Changes in Net Assets Attributable to Shareholders                                                                                   | 15          |
| Balance Sheet                                                                                                                                     | 16          |
| Notes to the Financial Statements                                                                                                                 | 17          |
| Distribution Tables                                                                                                                               | 23          |
| <br>                                                                                                                                              |             |
| <b>VT Brompton Adventurous Fund</b>                                                                                                               |             |
| Sub-fund Overview                                                                                                                                 | 24          |
| Investment Manager's Review                                                                                                                       | 26          |
| Performance Record                                                                                                                                | 27          |
| Portfolio Summary                                                                                                                                 | 29          |
| Summary of Material Portfolio Changes                                                                                                             | 30          |
| Statement of Total Return                                                                                                                         | 32          |
| Statement of Changes in Net Assets Attributable to Shareholders                                                                                   | 32          |
| Balance Sheet                                                                                                                                     | 33          |
| Notes to the Financial Statements                                                                                                                 | 34          |
| Distribution Tables                                                                                                                               | 40          |
| <br>                                                                                                                                              |             |
| Information for Investors                                                                                                                         | 41          |
| Corporate Directory                                                                                                                               | 43          |
| <br>                                                                                                                                              |             |
| <b>End subsection (unaudited)</b>                                                                                                                 |             |
| <br>                                                                                                                                              |             |
| Assessment of Value VT Brompton Cautious Fund                                                                                                     | 1-5         |
| Assessment of Value VT Brompton Adventurous Fund                                                                                                  | 1-5         |

## COMPANY OVERVIEW

---

### **Type of Company**

VT Brompton Funds ICVC (the 'Company') is an investment company (company number IC001077) with variable capital incorporated in England and Wales under the Open Ended Investment Company Regulations 2001 (SI2001/1228).

The Company was incorporated and authorised by the Financial Conduct Authority on 20 December 2016.

The Company is a UCITS scheme and is an umbrella company (as defined in the OEIC Regulations). Each Sub-fund would be a UCITS scheme if it had a separate authorisation order.

Shareholders are not liable for the debts of the Company.

### **Changes to Company**

On 12 December 2022, the name of the company changed from VT Grosvenor Funds ICVC to VT Brompton Funds ICVC and the name of the Sub-funds changed from this date as follows:

VT Grosvenor Cautious Fund changed to VT Brompton Cautious Fund

VT Grosvenor Adventurous Fund changed to VT Brompton Adventurous Fund

## STATEMENT OF THE AUTHORISED CORPORATE DIRECTOR'S RESPONSIBILITIES

---

The rules of the Financial Conduct Authority's Collective Investment Schemes Sourcebook require the Authorised Corporate Director to prepare financial statements for each accounting year which give a true and fair view of the financial position of the Company at the end of the financial year and its net revenue and net capital losses for the year. In preparing these financial statements the Authorised Corporate Director is required to:

> comply with the Prospectus, the Statement of Recommended Practice (SORP) for Authorised Funds issued by the Investment Association in May 2014, the Instrument of Incorporation, generally accepted accounting principles and applicable accounting standards, subject to any material departures which are required to be disclosed and explained in the financial statements.

> select suitable accounting policies and then apply them consistently.

> make judgements and estimates that are reasonable and prudent.

> prepare the financial statements on a going concern basis unless it is inappropriate to presume that the Company will continue in operation for the foreseeable future.

The Authorised Corporate Director is required to keep proper accounting records and manage the Company in accordance with the COLL regulations, the Instrument of Incorporation, and the Prospectus. The Authorised Corporate Director is responsible for taking reasonable steps for the prevention and detection of fraud and other irregularities.

## DIRECTOR'S STATEMENT

---

In accordance with the requirements of the Financial Conduct Authority's Collective Investment Scheme's Sourcebook, we hereby certify the annual report.

David Fraser FCCA

David E. Smith CA

Valu-Trac Investment Management Limited  
Authorised Corporate Director

Date

28 April 2023

## STATEMENT OF THE DEPOSITARY'S RESPONSIBILITIES AND REPORT OF THE DEPOSITARY TO THE SHAREHOLDERS OF VT BROMPTON FUNDS ICVC

---

**For the year ended 31 December 2022**

The Depositary must ensure that the Company is managed in accordance with the Financial Conduct Authority's Collective Investment Schemes 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 in the Company is 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 income is applied in accordance with the Regulations; and
- > the instructions of the Authorised Fund Manager ("the AFM") 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 AFM:

- i) has carried out the issue, sale, redemption, cancellation and calculation of the price of the Company's shares and application of the Company's income 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  
01 January 2023

## INDEPENDENT AUDITOR'S REPORT TO THE SHAREHOLDERS OF VT BROMPTON FUNDS ICVC (SUB-FUNDS VT BROMPTON CAUTIOUS FUND AND VT BROMPTON ADVENTUROUS FUND)

---

### Opinion

We have audited the financial statements of VT Brompton Funds ICVC ("the Company") for the year ended 31 December 2022 which comprise the Statements of Total Return, Statements of Changes in Net Assets Attributable to Shareholders, Balance Sheets, the related Notes to the Financial Statements, including significant accounting policies and the Distribution Tables. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Generally Accepted Accounting Practice including FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland".

In our opinion the financial statements:

- > give a true and fair view of the financial position of the Company at 31 December 2022 and of the net revenue and the net capital losses on the scheme property of the Company for the year then ended; and
- > have been properly prepared in accordance with the IA Statement of Recommended Practice for Authorised Funds, the rules of the Collective Investment Schemes Sourcebook 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 described further in the auditor's 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 12 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.

### Opinion on Other Matters Prescribed by the COLL Regulations

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.

### **Responsibilities of the Authorised Corporate Director**

As explained more fully in the Authorised Corporate Director's Responsibilities Statement set out on page 2, 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 liquidate 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.

### ***Extent to which the audit is 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 specific procedures for this engagement and the extent to which these 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, focusing on provisions of those laws and regulations 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 Collective Investment Schemes Sourcebook
- > 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 any relevant correspondence with regulatory bodies and the Company's breaches register.

We assessed the susceptibility of the Company's financial statements to material misstatement, including how fraud might occur, by meeting with management 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.

The following procedures were performed to provide reasonable assurance that the financial statements were free of material fraud or error:

- > 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; and
- > Assessing the Company's compliance with the key requirements of the Collective Investment Schemes Sourcebook and its Prospectus.

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

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

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 are to become aware of it.

A further description of our responsibilities is available on the Financial Reporting Council's website at: <https://www.frc.org.uk/Our-Work/Audit/Audit-and-assurance/Standards-and-guidance/Standards-and-guidance-for-auditors/Auditors-responsibilities-for-audit/Description-of-auditors-responsibilities-for-audit.aspx>. This description forms part of our auditor's report.

**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 Collective Investment Schemes sourcebook ("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 shareholders as a body, for our audit work, for this report, or for the opinions we have formed.

Johnston Carmichael LLP  
Chartered Accountants  
Statutory Auditor  
Elgin

Date 28 April 2023



## ACCOUNTING POLICIES

---

### For the year ended 31 December 2022

The principal accounting policies, which have been applied in both the current and prior year, are set out below:

#### 1 Accounting policies

- (a) The financial statements have been prepared in accordance with FRS 102, the Statement of Recommended Practice for Authorised Funds (SORP) issued by the Investment Association (IA) in May 2014 and the amendments to the SORP issued by the IA in June 2017. The functional currency is Sterling.
- (b) There are no material events that have been identified that may cast significant doubt about the Company's ability to continue as a going concern for at least the next twelve months from the date these financial statements are authorised for issue. The ACD believes that the Company has adequate resources to continue in operational existence for the foreseeable future and they continue to adopt the going concern basis in preparing the financial statements.
- (c) All expenses, other than those relating to the purchase and sale of investments, are charged to revenue on the financial statement on an accruals basis. All expenses are then reallocated to capital, net of any tax effect for distribution purposes up until the 10 November 2022, thereafter, expenses of the Sub-funds were charged to income with the exception of expenses relating to the purchase and sale of investments.
- (d) Distributions on equities and collectives are recognised when the security is quoted ex-dividend. Interest on gilts and deposits is accounted for on an accruals basis. Other revenue is accounted for on a receipts basis.
- (e) The ordinary element of stocks received in lieu of cash dividends is recognised as revenue of the Sub-funds, and where applicable is included in the distribution. In the case of an enhanced stock dividend the value of the enhancement is treated as capital.
- (f) Special dividends are treated as either revenue or a repayment of capital depending on the facts of each particular case. Where the receipt of a special dividend results in a significant reduction in the capital value or where the distribution arises from an underlying capital event such as a merger or disposal these would typically be deemed as capital so as to ensure that the matching principle is applied to gains and losses. Otherwise, the special dividend would typically be recognised as revenue. Where special dividends are treated as revenue, they are included in the amount available for distribution. The tax accounting treatment follows the principal amount.
- (g) The Sub-funds currently issues Accumulation shares. The Sub-funds go ex dividend twice annually and pays any income available to the shareholder two months in arrears, as a dividend distribution. Any revenue deficit is funded from capital.

If a distribution remains unclaimed for a period of six years after it has become due, it will be forfeited and will revert to the relevant Sub-funds (or if it no longer exists the ACD, if the sub fund no longer exists). Application to claim distributions that have not been paid should be made to the ACD before this six year period has elapsed.

For the treatment of expenses revert to policy 'c' and special dividends revert to policy 'f'.

Equalisation applies only to shares purchased during the distribution period (Group 2 shares). It represents the accrued revenue included in the purchase price of the shares. It is returned with the distribution as a capital repayment. It is not liable to income tax but must be deducted from the cost of the shares for capital gains tax purposes.

- (h) The listed investments of the Sub-funds have been valued at bid market prices at the closing valuation point at 12 noon on 30 December 2022, whilst unlisted collectives are valued at the closing bid price for dual priced funds and the closing single price for single priced funds.
- (i) Deferred tax is recognised in respect of all timing differences that have originated but not reversed at the balance sheet date where transactions or events have occurred at that date that will result in an obligation to pay less or receive more tax.  
  
Deferred tax assets are recognised only to the extent that the ACD considers that it is more likely than not there will be taxable profits from which underlying timing differences can be deducted.
- (j) In certain circumstances the ACD may charge a dilution levy on the sale or repurchase of shares. The levy, which is paid into the Sub-funds, is intended to cover certain charges not included in the bid market value of the Sub-funds, used in calculating the share price, which could have a diluting effect on the performance of the Sub-funds.
- (k) All transactions in foreign currencies are converted into Sterling at the rates of exchange ruling at the date of such transactions. Foreign currency assets and liabilities at the end of the accounting year are translated at the exchange rates at the closing valuation point on 30 December 2022.

## SUB-FUND OVERVIEW

---

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name of Sub-fund</b>                 | VT Brompton Cautious Fund                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Size of Sub-fund</b>                 | £167,829,500                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Launch date</b>                      | 06 January 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Investment objective and policy</b>  | <p>The Sub-fund aims to generate a total return (i.e. through a combination of capital and / or income growth), by utilising a cautious approach to investing, over the longer term (at least 5 years).</p> <p>The composition of the portfolio will reflect the Investment Manager's view of the potential future return of different asset classes and specific investments - for this Sub-fund the Investments manager aims to take a cautious approach, with a higher proportion of the Sub-fund exposed to assets which it considers "lower risk" (such as fixed income) and less in those which may be "higher risk" (such as certain equities).</p> <p>The Sub-fund will be actively managed and will typically invest at least 80% of its Net Asset Value in collective investment schemes (including exchange traded funds and investment trusts, and which may include schemes which are managed and/or advised by the ACD and/or Investment Manager).</p> <p>The collective investment vehicles will provide exposure to fixed income (including but not limited to sovereign bonds, corporate bonds and convertible bonds) and other conservative alternative investments (including, but not limited to, UCITS Long Short funds, market neutral funds and structured products) as well as equities. The Sub-fund's exposure to equities will not exceed 35% of the Net asset Value of the Sub-fund .</p> <p>The Sub-fund may also invest directly in other transferable securities (Including equities), money market instruments, cash and near cash.</p> <p>Investments will not be confined by geographical, industrial or economic sector.</p> <p>Derivatives may be used only for Efficient Portfolio Management (including hedging) in accordance with the FCA Rules. Efficient portfolio management means using derivatives in a way that is designed to reduce risk or cost and/or generate extra income or growth. Use of derivatives is expected to be limited.</p> |
| <b>Performance comparator:</b>          | <p>The Sub-fund is not managed to or constrained by a benchmark, and nor does the ACD use a benchmark in order to assess performance.</p> <p>However, many funds sold in the UK are grouped into sectors by the Investment Association (the "IA") (the trade body that represents UK investment managers), to help investors to compare funds with broadly similar characteristics.</p> <p>In order to assess the Sub-fund's performance, investors may find it useful to compare the Sub-fund against the performance of the IA Mixed Investment 0% - 35% Shares sector, which serves as a method of comparing the Sub-fund's performance with other funds which have broadly similar characteristics.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Ex-distribution dates</b>            | 30 June and 31 December                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Distribution dates</b>               | 31 August and last day of February                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Individual Savings Account (ISA)</b> | The Sub-fund is a qualifying investment for inclusion in an ISA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Share Classes</b>                    | Class A: Accumulation Retail<br>Class B: Accumulation Staff                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

## SUB-FUND OVERVIEW (continued)

---

### Minimum investment\*

|                        |                                                                                                                                                           |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Lump sum subscription: | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Top-up:                | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Holding:               | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Redemption:            | Class A: Accumulation Retail = N/A (provided minimum holding is maintained)<br>Class B: Accumulation Staff = N/A (provided minimum holding is maintained) |
| Switching:             | Class A: Accumulation Retail = N/A (provided minimum holding is maintained)<br>Class B: Accumulation Staff = N/A (provided minimum holding is maintained) |

\*The ACD may waive the minimum levels at its discretion.

The Class B shares are only available to employees of the Sub-fund's sponsor, Grosvenor Consultancy Asset Management Limited, or otherwise at the ACD's discretion.

**Initial, redemption and switching charges** Nil

### Annual management charges

The Annual management charges are: Class A: Accumulation Retail = 0.65%  
Class B: Accumulation Staff = 0.45%

The above percentages being percentages of the net asset value of the Sub-fund attributable to the relevant share class (plus VAT if applicable).

### Changes to the Sub-fund

From 11 November 2022, expenses of the Sub-fund are taken from income as opposed to capital prior to this date.

On 11 November 2022, some clarifications were made to the investment objective and policy wording to that above. In particular, the volatility target for the Sub-fund was removed from the objectives as it is considered that this target may actually lead to the investment manager taking a higher degree of risk than would otherwise be desired or appropriate, irrespective of the investment manager's view of the potential future return of different asset classes. These amendments are not expected to result in any change to the way in which the sub-funds operate or the investments which each makes.

On 12 December 2022, the Sub-fund changed its name from VT Grosvenor Cautious Fund to VT Brompton Cautious Fund.

## INVESTMENT MANAGER'S REVIEW

---

The A Accumulation share class of the VT Brompton Cautious Fund fell 8.07% over the year to 31 December 2022 while the IA Mixed Investment 0-35% Shares Total Return sector fell 10.91%.

Global equities and bonds fell 7.62% and 5.70% respectively in sterling over the year under review in response to the Russia-Ukraine war, China's zero-Covid-19 lockdown policies, rising inflation and interest rate expectations and deteriorating economic prospects. Inflation was fuelled by higher energy prices, supply constraints and tight labour markets. US consumer price inflation peaked at 9.1% in June, its highest level since 1982, before falling to 6.5% in December. UK and eurozone inflation also retreated from peaks but December figures continued to cause concern among investors at 10.5% and 9.2% respectively. Starting at near zero, central banks tightened monetary policy through a series of interest rate rises as they attempted to control inflation. In December, the Federal Reserve, European Central Bank and Bank of England increased their official interest rates by half a percentage point, taking them to 4.25-4.5%, 2% and 3.5% respectively. Investors took comfort from moderating inflation and leading indicators that pointed to economic weakness. This implied that the peak in the interest rate cycle would be lower than feared. As a result, equities started to recover near the year end. The International Monetary Fund forecasted global economic growth to slow to 2.7% in 2023, with UK growth forecast at just 0.3%, a consequence of above-average inflation and tighter monetary conditions.

Global growth stocks fell 19.43% in sterling while value stocks rose 4.87%. Within the Cautious portfolio, growth-oriented holdings such as Fundsmith Equity and Blackrock European Dynamic were sold because of the negative impact of rising interest rates as investors de-rated highly-valued 'growth stocks' in response to rising bond yields. Polar Capital Global Insurance and the Xtrackers MSCI World Health Care exchange-traded fund (ETF) were added because slowing economic growth and recession risk warranted defensive equity positions in companies that are typically less sensitive to changes in macroeconomic conditions. These companies also tend to be more resilient because of the low substitutability of their goods and services. Within the alternative investments allocation, daily-traded long-short equity holdings provided protection and diversification in an environment where both bonds and equities were falling. Gold rose 11.77% in sterling over the year as investors sought safe-haven investments.

Following the UK government's announcement of unfunded tax cuts, sterling briefly reached a \$1.03 historic low. The BoE intervened to restore market stability by carrying out temporary purchases of long-dated UK government bonds and the tax cuts were reversed. Gilts fell 25.02% over the year as the BoE raised interest rates, while sterling investment-grade corporate and high-yield bonds fell 18.37% and 11.03% respectively. The portfolio had no investments in funds dedicated to gilts. The portfolio benefitted from its exposure to short-dated inflation-linked bonds and profits were taken after a period of solid performance. Inflation-linked bonds may underperform as inflation continues to soften. The proceeds were reinvested into a sterling-hedged iShares \$ Treasury Bond 7-10 Years ETF holding and Vanguard Global Bond because longer-dated government bonds appeared attractive with US 10-year treasury bond yields close to 3%. Credit exposure was topped up during the second half of the year through Jupiter Dynamic Bond and TwentyFour Dynamic Bond.

The UK stockmarket was relatively resilient, up 1.16% thanks to its large sector weightings in energy, materials and healthcare. UK smaller companies fell 17.87%, however, as prospects for domestic conditions deteriorated. Chelverton UK Equity Growth, a small company specialist holding, was sold in the first half of the year but reintroduced later because valuations appeared attractive following a period of weak performance.

In Japan, Lindsell Train Japanese Equity was added because it owns consumer stocks that appear attractive and may perform well as Japan's economy continues to recover from the pandemic. China's zero-covid-19 lockdown policies and dollar strength negatively affected equities in Asia excluding Japan and emerging markets.

Towards the year end, defensive investments in areas such as long-short equity and healthcare were decreased in favour of equities and corporate bonds that appeared relatively cheap having performed poorly. In particular, holdings in Asian and emerging market equities were added to benefit from tailwinds coming from China's easing of lockdown restrictions and moderating inflation, which may prompt the Fed to become less hawkish, a change that would be likely to weaken the dollar.

Brompton Asset Management LLP  
Investment Manager to the Fund  
27 January 2023

Source: Refinitiv Lipper; global equities: MSCI AC World TR, global bonds: Bloomberg Barclays Global Aggregate Bond TR, oil: S&P GSCI Crude Oil TR, commodities: S&P GSCI TR, gilts: Markit iBoxx Sterling Gilts Overall TR, sterling corporates: Markit iBoxx Sterling Corporates TR, sterling high yields: ICE BofAML Sterling High Yield TR GBP, growth equities: MSCI AC World Growth TR, value equities: MSCI AC World Value TR, UK equities: MSCI United Kingdom All Cap TR, UK smaller companies: Numis Smaller Companies (-InvTrust) TR, Asia ex Japan equities: MSCI AC Asia ex Japan TR, emerging market equities: MSCI EM (Emerging Markets) TR, gold: S&P GSCI Gold TR.

## PERFORMANCE RECORD

### Financial Highlights

#### Class A: Accumulation Retail

|                                              | Year to 31<br>December 2022 | Year to 31<br>December 2021 | Year to 31<br>December 2020 |
|----------------------------------------------|-----------------------------|-----------------------------|-----------------------------|
| Changes in net assets per share              | GBP                         | GBP                         | GBP                         |
| Opening net asset value per share            | 118.2277                    | 111.4269                    | 108.9246                    |
| Return before operating charges              | (8.1433)                    | 8.2821                      | 4.0007                      |
| Operating charges (note 1)                   | (1.3955)                    | (1.4813)                    | (1.4984)                    |
| Return after operating charges *             | (9.5388)                    | 6.8008                      | 2.5023                      |
| Closing net asset value per share            | 108.6889                    | 118.2277                    | 111.4269                    |
| Retained distributions on accumulated shares | 1.7895                      | 2.1024                      | 1.8779                      |
| *after direct transactions costs of:         | 0.0113                      | 0.0066                      | 0.0126                      |
| Performance                                  |                             |                             |                             |
| Return after charges                         | (8.07%)                     | 6.10%                       | 2.30%                       |
| Other information                            |                             |                             |                             |
| Closing net asset value                      | £164,812,710                | £172,757,661                | £134,443,713                |
| Closing number of shares                     | 151,637,134                 | 146,122,883                 | 120,656,440                 |
| Operating charges (note 2)                   | 1.23%                       | 1.29%                       | 1.36%                       |
| Direct transaction costs                     | 0.01%                       | 0.01%                       | 0.01%                       |
| Prices                                       |                             |                             |                             |
| Highest share price                          | 118.4466                    | 118.3380                    | 112.5579                    |
| Lowest share price                           | 105.3030                    | 110.6613                    | 94.4037                     |

#### Class B: Accumulation Staff

|                                              | Year to 31<br>December 2022 | Year to 31<br>December 2021 | Year to 31<br>December 2020 |
|----------------------------------------------|-----------------------------|-----------------------------|-----------------------------|
| Changes in net assets per share              | GBP                         | GBP                         | GBP                         |
| Opening net asset value per share            | 119.8255                    | 112.7200                    | 109.9466                    |
| Return before operating charges              | (8.2247)                    | 8.3729                      | 4.0649                      |
| Operating charges (note 1)                   | (1.1857)                    | (1.2674)                    | (1.2915)                    |
| Return after operating charges *             | (9.4104)                    | 7.1055                      | 2.7734                      |
| Closing net asset value per share            | 110.4151                    | 119.8255                    | 112.7200                    |
| Retained distributions on accumulated shares | 1.8149                      | 2.1271                      | 1.8980                      |
| *after direct transactions costs of:         | 0.0115                      | 0.0067                      | 0.0127                      |
| Performance                                  |                             |                             |                             |
| Return after charges                         | (7.85%)                     | 6.30%                       | 2.52%                       |
| Other information                            |                             |                             |                             |
| Closing net asset value                      | £3,188,796                  | £3,849,745                  | £2,449,262                  |
| Closing number of shares                     | 2,888,006                   | 3,212,794                   | 2,172,872                   |
| Operating charges (note 2)                   | 1.03%                       | 1.09%                       | 1.16%                       |
| Direct transaction costs                     | 0.01%                       | 0.01%                       | 0.01%                       |
| Prices                                       |                             |                             |                             |
| Highest share price                          | 120.0500                    | 119.9077                    | 113.8931                    |
| Lowest share price                           | 106.9650                    | 111.9820                    | 95.3518                     |

## PERFORMANCE RECORD (Continued)

---

1. The operating charges per share figure is calculated by applying the operating charges percentage to the average net asset valuation per share throughout the period.
2. The operating charges percentage is based on the expenses incurred during the period annualised, as a proportion of the average net asset value of the Sub-fund plus the costs of the underlying holdings.

### **Risk Profile**

Based on past data, the Sub-fund is ranked a '4' on the synthetic risk and reward indicator scale (of 1 to 7) as described fully in the Key Investor Information Document. The Sub-fund is ranked 4 because funds of this type have experienced average rises and falls in market prices historically (31 December 2021: ranked 4). The higher the rank, the greater the potential reward but the greater the risk of losing money.

## PORTFOLIO SUMMARY

As at 31 December 2022

| Holding                                              |                                                    | Value £            | % of net assets |
|------------------------------------------------------|----------------------------------------------------|--------------------|-----------------|
| <b>FUNDS &amp; TRUSTS (31.12.2021: 92.55%)</b>       |                                                    |                    |                 |
| 1,179,529                                            | 3i Infrastructure PLC                              | 3,910,139          | 2.33            |
| 512,951                                              | Baillie Gifford Global Income Growth               | 4,824,815          | 2.87            |
| 1,003,638                                            | BlackRock European Absolute Alpha                  | 1,695,026          | 1.01            |
| 1,417,619                                            | Balanced Commercial Property Trust Limited         | 1,261,681          | 0.75            |
| 121,052                                              | CT Real Estate Equity Market Neutral Fund          | 1,670,513          | 1.00            |
| 4,632,553                                            | Fidelity Funds - Global Inflation-linked Bond      | 5,957,464          | 3.55            |
| 290,911                                              | Guinness Global Equity Income                      | 5,401,047          | 3.22            |
| 3,304,995                                            | Goldman Sachs Sterling Liquid Reserves             | 3,304,995          | 1.97            |
| 48,122                                               | Goldman Sachs Emerging Markets Equity Portfolio    | 835,878            | 0.50            |
| 12,712                                               | iShares Core S&P 500 UCITS ETF                     | 4,187,079          | 2.49            |
| 119,050                                              | iShares Physical Gold ETC                          | 3,502,451          | 2.09            |
| 5,980,221                                            | iShares \$ Treasury Bond 7-10y UCITS ETF           | 26,626,814         | 15.87           |
| 1,077,105                                            | Jupiter JGF Dynamic Bond                           | 9,930,908          | 5.92            |
| 1,447,294                                            | Lindsell Train Japanese Equity                     | 3,462,941          | 2.06            |
| 1,429,904                                            | Liontrust Special Situations Fund                  | 6,622,741          | 3.95            |
| 16,342                                               | Man GLG Asia Pacific (ex-Japan) Equity Alternative | 1,658,192          | 0.99            |
| 1,265,232                                            | Man GLG UK Absolute Value                          | 1,763,733          | 1.05            |
| 2,220,110                                            | Man GLG UK Income Professional                     | 7,310,822          | 4.36            |
| 146,809                                              | Matthews Asia Funds-Asia ex Jap Dividend           | 1,779,323          | 1.06            |
| 1,082,612                                            | MI Chelverton UK Equity Growth                     | 3,380,706          | 2.01            |
| 100,198                                              | MI TwentyFour Dynamic Bond                         | 8,929,991          | 5.32            |
| 377,846                                              | Polar Capital Global Insurance                     | 3,882,674          | 2.31            |
| 69,732                                               | Polar Capital Global Technology                    | 3,386,203          | 2.02            |
| 16,831                                               | RWC Global Emerging Markets                        | 3,451,211          | 2.06            |
| 85,363                                               | Schroder ISF Strategic Credit                      | 10,510,115         | 6.26            |
| 1,075,582                                            | Troy Trojan                                        | 3,295,798          | 1.96            |
| 232,972                                              | Vanguard Global Bond Index                         | 27,327,546         | 16.28           |
| 92,478                                               | Xtrackers MSCI World Health Care UCITS             | 3,741,298          | 2.23            |
|                                                      |                                                    | <b>163,612,105</b> | <b>97.49</b>    |
| <b>BONDS &amp; GILTS (31.12.2021: 1.42%)</b>         |                                                    |                    |                 |
| 2,500,000                                            | UK GILT 22/07/2023                                 | 2,456,550          | 1.46            |
| <b>Portfolio of investments (31.12.2021: 93.97%)</b> |                                                    | <b>166,068,655</b> | <b>98.95</b>    |
| <b>Net other assets (31.12.2021:6.06%)</b>           |                                                    | <b>1,760,845</b>   | <b>1.05</b>     |
|                                                      |                                                    | <b>167,829,500</b> | <b>100.00</b>   |

Note: The 31 December 2021 comparators percentages are based on Mid pricing and does not add up to 100%. The Mid to Bid adjustment for the year ended 31 December 2021 was (0.03%).

## SUMMARY OF MATERIAL PORTFOLIO CHANGES

|                                                    | £                  |
|----------------------------------------------------|--------------------|
| <b>Total purchases for the year (note 14)</b>      | <b>132,833,951</b> |
| BlackRock European Absolute Alpha                  | 850,922            |
| BlackRock European Dynamic                         | 842,423            |
| BlackRock Natural Resources Growth & Income        | 3,433,786          |
| CT Real Estate Equity Market Neutral Fund          | 3,450,000          |
| Goldman Sachs Emerging Markets Equity Portfolio    | 845,021            |
| Goldman Sachs Sterling Liquid Reserves             | 11,885,442         |
| iShares \$ Treasury Bond 7-10y UCITS ETF           | 28,689,471         |
| iShares Core FTSE 100 UCITS ETF                    | 2,736,466          |
| iShares Core MSCI World UCITS ETF                  | 4,059,929          |
| iShares Core S&P 500 UCITS ETF                     | 2,808,987          |
| iShares Edge MSCI World Value Factor UCITS ETF     | 1,714,494          |
| iShares Physical Gold ETC                          | 2,001,171          |
| Jupiter JGF Dynamic Bond                           | 6,826,388          |
| Lindsell Train Japanese Equity                     | 3,413,907          |
| Liontrust Special Situations Fund                  | 1,712,388          |
| Man GLG Asia Pacific (ex-Japan) Equity Alternative | 1,638,466          |
| Man GLG UK Absolute Value                          | 839,251            |
| Matthews Asia Funds-Asia ex Jap Dividend           | 1,622,645          |
| MI Chelverton UK Equity Growth                     | 3,353,825          |
| MI TwentyFour Dynamic Bond                         | 5,055,869          |
| Polar Capital Global Insurance                     | 3,375,000          |
| Polar Capital Global Technology                    | 2,549,829          |
| RWC Global Emerging Markets                        | 3,373,015          |
| Schroder ISF Strategic Credit                      | 3,423,053          |
| Vanguard Global Bond Index                         | 28,889,126         |
| Xtrackers MSCI World Health Care UCITS             | 3,443,077          |
|                                                    | £                  |
| <b>Total sales for the year (note 14)</b>          | <b>117,217,849</b> |
| 3i Infrastructure PLC                              | 527,213            |
| Artemis Strategic Bond                             | 4,358,681          |
| BlackRock European Absolute Alpha                  | 2,493,887          |
| BlackRock European Dynamic                         | 4,806,367          |
| BlackRock Natural Resources Growth & Income        | 3,645,409          |
| CT Real Estate Equity Market Neutral Fund          | 1,720,119          |
| Fidelity Funds - Global Inflation-linked Bond      | 5,122,333          |
| Fundsmith Equity                                   | 1,327,095          |
| Goldman Sachs Sterling Liquid Reserves Inst        | 13,983,520         |
| iShares Core FTSE 100 UCITS ETF                    | 2,678,872          |
| iShares Core MSCI World UCITS ETF                  | 4,217,514          |
| iShares Core S&P 500 UCITS ETF                     | 1,682,071          |
| iShares Edge MSCI World Value Factor UCITS ETF     | 4,076,260          |
| iShares Physical Gold ETC                          | 4,159,601          |
| Janus Henderson Fixed Interest Monthly Inc         | 4,051,534          |
| Jupiter JGF Dynamic Bond                           | 1,669,427          |
| Legal & General Global Inflation Linked Bond Index | 9,159,411          |
| Liontrust Special Situations Fund                  | 865,907            |
| Man GLG UK Absolute Value                          | 2,578,001          |
| Matthews Asia Funds-Asia ex Jap Dividend           | 1,553,791          |
| MI Chelverton UK Equity Growth                     | 1,931,684          |
| MI Chelverton UK Equity Income                     | 2,789,714          |
| Picton Property Income Ltd                         | 1,073,278          |
| PIMCO GIS Global Low Duration Real Return Inst     | 14,857,355         |
| PIMCO GIS Global Real Return Inst                  | 4,603,366          |
| PIMCO Select UK Income Bond                        | 5,249,269          |
| Royal London Short Duration Global High Yield Bond | 6,549,686          |
| T. Rowe Jap Equity                                 | 935,657            |
| Troy Trojan                                        | 1,687,891          |
| Vulcan Value Equity                                | 2,862,936          |

The above represents the purchases and sales for the year.

VT BROMPTON FUNDS ICVC - VT BROMPTON CAUTIOUS FUND

For the year ended 31 December 2022



## STATEMENT OF TOTAL RETURN

For the year ended 31 December

|                                                                                      |       |                  | 2022                | 2021               |
|--------------------------------------------------------------------------------------|-------|------------------|---------------------|--------------------|
|                                                                                      | Notes | £                | £                   | £                  |
| Income                                                                               |       |                  |                     |                    |
| Net capital (losses)/gains                                                           | 2     |                  | (17,226,381)        | 7,602,949          |
| Revenue                                                                              | 3     | 4,380,724        |                     | 3,064,502          |
| Expenses                                                                             | 4     | (1,183,615)      |                     | (1,101,870)        |
| Interest payable and similar charges                                                 | 6     | <u>(3,561)</u>   |                     | <u>(42,863)</u>    |
| Net revenue before taxation                                                          |       | 3,193,548        |                     | 1,919,769          |
| Taxation                                                                             | 5     | <u>(427,483)</u> |                     | <u>(191,594)</u>   |
| Net revenue after taxation                                                           |       |                  | <u>2,766,065</u>    | <u>1,728,175</u>   |
| Total return before distributions                                                    |       |                  | (14,460,316)        | 9,331,124          |
| Finance costs: distributions                                                         | 6     |                  | <u>(2,723,070)</u>  | <u>(2,833,438)</u> |
| <b>Changes in net assets attributable to shareholders from investment activities</b> |       |                  | <u>(17,183,386)</u> | <u>6,497,686</u>   |

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO SHAREHOLDERS

For the year ended 31 December

|                                                                                           | 2022                | 2021               |
|-------------------------------------------------------------------------------------------|---------------------|--------------------|
|                                                                                           | £                   | £                  |
| <b>Opening net assets attributable to shareholders</b>                                    | 176,476,831         | 136,785,706        |
| Amounts receivable on creation of shares                                                  | 21,636,895          | 41,640,642         |
| Amounts payable on cancellation of shares                                                 | (15,845,293)        | (11,456,797)       |
| Accumulation dividends retained                                                           | 2,744,453           | 3,009,594          |
| Changes in net assets attributable to shareholders from investment activities (see above) | <u>(17,183,386)</u> | <u>6,497,686</u>   |
| <b>Closing net assets attributable to shareholders</b>                                    | <u>167,829,500</u>  | <u>176,476,831</u> |

**BALANCE SHEET**

---

| As at                                          | Notes | 31.12.2022       |                    | 31.12.2021        |                    |
|------------------------------------------------|-------|------------------|--------------------|-------------------|--------------------|
|                                                |       | £                | £                  | £                 | £                  |
| <b>FIXED ASSETS</b>                            |       |                  |                    |                   |                    |
| Investment assets                              |       |                  | 166,068,655        |                   | 165,791,979        |
| <b>Current assets</b>                          |       |                  |                    |                   |                    |
| Debtors                                        | 7     | 480,630          |                    | 917,596           |                    |
| Cash and bank balances                         | 8     | <u>2,040,916</u> |                    | <u>10,086,520</u> |                    |
| <b>Total current assets</b>                    |       |                  | <u>2,521,546</u>   |                   | <u>11,004,116</u>  |
| <b>Total assets</b>                            |       |                  | 168,590,201        |                   | 176,796,095        |
| <b>CURRENT LIABILITIES</b>                     |       |                  |                    |                   |                    |
| <b>Creditors</b>                               |       |                  |                    |                   |                    |
| Bank overdraft                                 | 8     | (158,874)        |                    | -                 |                    |
| Creditors                                      | 9     | <u>(601,827)</u> |                    | <u>(319,264)</u>  |                    |
| <b>Total current liabilities</b>               |       |                  | <u>(760,701)</u>   |                   | <u>(319,264)</u>   |
| <b>Net assets attributable to shareholders</b> |       |                  | <u>167,829,500</u> |                   | <u>176,476,831</u> |

## NOTES TO THE FINANCIAL STATEMENTS

---

### 1 Accounting policies

Please revert to page 7 for accounting policies.

### 2 Net capital (losses)/gains

|                                          | 2022                | 2021             |
|------------------------------------------|---------------------|------------------|
|                                          | £                   | £                |
| The net capital (losses)/gains comprise: |                     |                  |
| Non-derivative securities (losses)/gains | (17,231,115)        | 7,603,002        |
| Transaction charges (custodian)          | (2,262)             | (53)             |
| Currency gains                           | 6,996               | -                |
| Total net capital (losses)/gains         | <u>(17,226,381)</u> | <u>7,602,949</u> |

### 3 Revenue

|                                       | 2022             | 2021             |
|---------------------------------------|------------------|------------------|
|                                       | £                | £                |
| Non-taxable dividends                 | 1,056,135        | 961,800          |
| Property income distributions (PIDs)  | 100,110          | 90,069           |
| Interest on non-derivative securities | 3,188,317        | 2,012,510        |
| Bank interest                         | 36,162           | 123              |
| Total revenue                         | <u>4,380,724</u> | <u>3,064,502</u> |

### 4 Expenses

|                                                                                                                                             | 2022             | 2021             |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------|
|                                                                                                                                             | £                | £                |
| <b>Payable to the Authorised Corporate Director,<br/>associates of the Authorised Corporate Director,<br/>and agents of either of them:</b> |                  |                  |
| Annual management charge                                                                                                                    | <u>1,094,002</u> | <u>1,017,073</u> |
| <b>Payable to the depositary, associates of the<br/>depositary, and agents of either of them:</b>                                           |                  |                  |
| Depositary fee                                                                                                                              | 56,997           | 52,904           |
| Safe custody fee                                                                                                                            | 14,058           | 15,618           |
|                                                                                                                                             | <u>71,055</u>    | <u>68,522</u>    |
| <b>Other expenses:</b>                                                                                                                      |                  |                  |
| Audit fee                                                                                                                                   | 7,770            | 7,074            |
| FCA fee                                                                                                                                     | 50               | 52               |
| Other expenses                                                                                                                              | 10,738           | 9,149            |
|                                                                                                                                             | <u>18,558</u>    | <u>16,275</u>    |
| Total expenses                                                                                                                              | <u>1,183,615</u> | <u>1,101,870</u> |

NOTES TO THE FINANCIAL STATEMENTS (Continued)

5 Taxation

|                                           | 2022           | 2021           |
|-------------------------------------------|----------------|----------------|
|                                           | £              | £              |
| <b>(a) Analysis of charge in the year</b> |                |                |
| UK Corporation tax                        | 427,483        | 191,594        |
| Total tax charge for the year (note 5b)   | <u>427,483</u> | <u>191,594</u> |

**(b) Factors affecting current tax charge for the year**

The tax assessed for the year is lower than the standard rate of corporation tax in the UK for an open-ended investment company 20.00% (2021:20.00%). The differences are explained below:

|                                           |                  |                  |
|-------------------------------------------|------------------|------------------|
| Net revenue before taxation               | 3,193,548        | 1,919,769        |
| Corporation tax at 20.00% (2021:20.00%)   | <u>638,710</u>   | <u>383,954</u>   |
| <b>Effects of:</b>                        |                  |                  |
| Revenue not subject to UK corporation tax | <u>(211,227)</u> | <u>(192,360)</u> |
| Total tax charge for the year (note 5a)   | <u>427,483</u>   | <u>191,594</u>   |

**(c) Provision for deferred taxation**

At 31 December 2022 there is no potential deferred tax asset or liability (31 December 2021: £nil).

6 Finance costs

|                                                 | 2022               | 2021             |
|-------------------------------------------------|--------------------|------------------|
|                                                 | £                  | £                |
| Interim dividend distribution                   | 1,359,752          | 1,636,298        |
| Final dividend distribution                     | <u>1,384,701</u>   | <u>1,373,296</u> |
|                                                 | 2,744,453          | 3,009,594        |
| Add: Revenue deducted on cancellation of shares | 74,883             | 62,270           |
| Deduct: Revenue received on issue of shares     | <u>(96,266)</u>    | <u>(238,426)</u> |
| <b>Net distribution for the year</b>            | 2,723,070          | 2,833,438        |
| Interest payable and similar charges            | <u>3,561</u>       | <u>42,863</u>    |
| <b>Total finance costs</b>                      | <u>2,726,631</u>   | <u>2,876,301</u> |
| <b>Reconciliation of distributions</b>          |                    |                  |
| Net revenue after taxation                      | 2,766,065          | 1,728,175        |
| Expenses paid from capital                      | 1,016,113          | 1,101,870        |
| Relief on expenses allocated to capital         | (203,223)          | (220,374)        |
| Balance brought forward                         | 159,293            | 383,060          |
| Balance carried forward                         | <u>(1,015,178)</u> | <u>(159,293)</u> |
| <b>Net distribution for the year</b>            | <u>2,723,070</u>   | <u>2,833,438</u> |

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

| <b>7 Debtors</b>                                 | <b>31.12.2022</b> | <b>31.12.2021</b> |
|--------------------------------------------------|-------------------|-------------------|
|                                                  | <b>£</b>          | <b>£</b>          |
| Amounts receivable on creation of shares         | 64,695            | 474,461           |
| Accrued revenue:                                 |                   |                   |
| Non-taxable dividends receivable                 | 37,444            | 102,908           |
| Interest on non-derivative securities receivable | 370,551           | 335,974           |
| Property income distributions receivable         | 5,670             | 4,253             |
| Prepayments                                      | 2,270             | -                 |
| Total debtors                                    | <u>480,630</u>    | <u>917,596</u>    |

| <b>8 Cash and bank balances</b> | <b>31.12.2022</b> | <b>31.12.2021</b> |
|---------------------------------|-------------------|-------------------|
|                                 | <b>£</b>          | <b>£</b>          |
| Cash and bank balances          | 2,040,916         | 10,086,520        |
| Bank overdraft                  | <u>(158,874)</u>  | <u>-</u>          |

| <b>9 Creditors</b>                                                                                                                  | <b>31.12.2022</b> | <b>31.12.2021</b> |
|-------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|
|                                                                                                                                     | <b>£</b>          | <b>£</b>          |
| Amounts payable on cancellation of shares                                                                                           | 48,782            | 12,906            |
| <b>Payable to the Authorised Corporate Director, associates of the Authorised Corporate Director, and agents of either of them:</b> |                   |                   |
| Annual management charge                                                                                                            | 89,840            | 95,692            |
| <b>Payable to the depositary, associates of the depositary, and agents of either of them:</b>                                       |                   |                   |
| Depositary fee's                                                                                                                    | 4,652             | 4,913             |
| Safe custody and other custodian charges                                                                                            | 20,364            | 6,544             |
|                                                                                                                                     | <u>25,016</u>     | <u>11,457</u>     |
| UK Corporation tax payable                                                                                                          | 427,483           | 191,594           |
| Other accrued expenses                                                                                                              | 10,706            | 7,615             |
| Total creditors                                                                                                                     | <u>601,827</u>    | <u>319,264</u>    |

### 10 Risk management policies

In pursuing its investment objective as stated on page 8, the Sub-fund holds a number of financial instruments. The Sub-fund's financial instruments comprise securities and other investments, cash balances, debtors and creditors that arise directly from its operations, for example, in respect of sales and purchases awaiting settlement, amounts receivable for issues and payable for redemptions and debtors for accrued revenue.

The main risks arising from the Sub-fund's financial instruments, those of its underlying holdings and the ACD's policies for managing these risks are summarised below. These policies have been applied throughout the year.

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

### 10 Risk management policies (continued)

#### Market price risk

Market price risk is the risk that the value of the Sub-fund's investment holdings will fluctuate as a result of changes in market prices caused by factors other than interest rate or foreign currency movement. Market price risk arises mainly from uncertainty about future prices of financial instruments the Sub-fund holds. It represents the potential loss the Sub-fund might suffer through holding market positions in the face of price movements.

The Sub-fund's investment portfolio is exposed to market price fluctuations, which are monitored by the ACD in pursuance of the investment objective and policy as set out in the Prospectus.

Adherence to investment guidelines and to investment and borrowing powers set out in the Instrument of Incorporation, the Prospectus and in the rules of the Financial Conduct Authority's Collective Investment Schemes Sourcebook mitigates the risk of excessive exposure to any particular type of security or issuer.

If market prices at the balance sheet date had been 10% higher or lower while all other variables remained constant, the return attributable to ordinary shareholders and equity for the year ended 31 December 2022 would have increased/decreased by £16,606,866 (31 December 2021: £16,579,198).

#### Foreign currency risk

Foreign currency risk is the risk that the value of the Sub-fund's investment holdings will fluctuate as a result of changes in foreign currency exchange rates.

The Sub-fund's investment portfolio is partly invested in collective investment schemes that are registered overseas and also collective investment schemes that invest in overseas securities and the balance sheet can be affected by movements in foreign exchange rates. The ACD may seek to manage exposure to currency movements by using forward exchange contracts or by hedging the Sterling value of investments that are priced in other currencies. Revenue received in other currencies is converted to Sterling on or near the date of receipt.

Net currency assets and liabilities consist of:

|              | Net monetary assets and liabilities |                   | Non-monetary assets and liabilities |                    | Total net assets   |                    |
|--------------|-------------------------------------|-------------------|-------------------------------------|--------------------|--------------------|--------------------|
|              | £                                   |                   | £                                   |                    | £                  |                    |
|              | 31.12.2022                          | 31.12.2021        | 31.12.2022                          | 31.12.2021         | 31.12.2022         | 31.12.2021         |
| Sterling     | 1,760,845                           | 10,684,852        | 162,327,357                         | 165,791,979        | 164,088,202        | 176,476,831        |
| US Dollars   | -                                   | -                 | 3,741,298                           | -                  | 3,741,298          | -                  |
| <b>Total</b> | <b>1,760,845</b>                    | <b>10,684,852</b> | <b>166,068,655</b>                  | <b>165,791,979</b> | <b>167,829,500</b> | <b>176,476,831</b> |

#### Interest rate risk

Interest rate risk is the risk to portfolio value due to changes in interest rates. The magnitude of the exposure from an adverse change in interest rates depends on the sensitivity of the instrument to changes in interest rates as well as the absolute change in interest rates. In general, values of long-term instruments are more sensitive to interest rate changes than the values of short-term instruments.

The Sub-fund takes on interest rate risk when the investment manager believes the expected returns compensate for the risk, limited by the investment objective, policy and any prospectus rules. The investment manager monitors the level of interest rate risk in the fund on a regular basis. In addition any cash deposits in the sub-fund are linked to SONIA, ensuring interest income increases as interest rates increase.

The table below details the interest rate risk profile at the balance sheet date:

|                                                        | <b>31.12.2022</b>  | <b>31.12.2021</b>  |
|--------------------------------------------------------|--------------------|--------------------|
|                                                        | <b>£</b>           | <b>£</b>           |
| Financial assets floating rate                         | 2,040,916          | 10,086,520         |
| Financial assets interest bearing instruments          | 95,044,383         | 82,927,880         |
| Financial assets non-interest bearing instruments      | 71,504,902         | 83,781,695         |
| Financial liabilities non-interest bearing instruments | (601,827)          | (319,264)          |
| Financial liabilities floating rate                    | (158,874)          | -                  |
|                                                        | <b>167,829,500</b> | <b>176,476,831</b> |

**10 Risk management policies (continued)**

**Maturity of financial liabilities**

The financial liabilities of the Sub-fund as at 31 December 2022 are payable either within one year or on demand.

**Liquidity risk**

The Sub-fund's assets comprise mainly of readily realisable securities. The main liability of the Sub-fund is the redemption of any shares that the investors wish to sell. Assets of the Sub-fund may need to be sold if insufficient cash is available to finance such redemptions.

**Credit risk**

Certain transactions in securities and bonds that the Sub-fund enters into expose it to the risk that the counterparty will not deliver the investment for a purchase, or cash for a sale after the Sub-fund has fulfilled its responsibilities. The Sub-fund only buys and sells investments (including gilts) through brokers which have been approved by the ACD as acceptable counterparties and fund management companies. In addition, limits are set to the exposure to any individual broker that may exist at any time and changes in brokers' financial ratings are reviewed.

Credit risk also arises on cash held within financial institutions. Credit risk on cash balances is mitigated by ensuring that cash is held with financial institutions that are at least investment grade credit related. Indirect credit risk arises from holdings in collectives that invest in debt securities as any default or perceived risk of default will affect the valuation of such holdings.

**Fair value disclosure**

The fair value hierarchy is intended to prioritise the inputs that are used to measure the fair value of assets and liabilities. The highest priority is given to quoted prices and the lowest priority to un-observable inputs. The criteria applied to the fair values levels in these financial statements are as follows:

Level 1: Unadjusted quoted price in an active market for an identical instrument;

Level 2: Valuation techniques using observable inputs other than quoted prices within level 1;

Level 3: Valuation techniques using unobservable inputs.

| Valuation Technique                                                                           | 31.12.2022         |                         | 31.12.2021         |                         |
|-----------------------------------------------------------------------------------------------|--------------------|-------------------------|--------------------|-------------------------|
|                                                                                               | Assets<br>(£000's) | Liabilities<br>(£000's) | Assets<br>(£000's) | Liabilities<br>(£000's) |
| Level 1: Unadjusted quoted price in an active market for an identical instrument              | 45,686             | -                       | 20,907             | -                       |
| Level 2: Valuation techniques using observable inputs other than quoted prices within level 1 | 120,383            | -                       | 144,885            | -                       |
| Total                                                                                         | 166,069            | -                       | 165,792            | -                       |

**11 Shares held**

**Class A: Accumulation Retail**

|                                     |                    |
|-------------------------------------|--------------------|
| <b>Opening shares at 01.01.2022</b> | <b>146,122,883</b> |
| Shares issued during the year       | 19,244,608         |
| Shares cancelled during the year    | (13,730,357)       |
| Shares converted during the year    | -                  |
| <b>Closing shares at 31.12.2022</b> | <b>151,637,134</b> |

**Class B: Accumulation Staff**

|                                     |                  |
|-------------------------------------|------------------|
| <b>Opening shares at 01.01.2022</b> | <b>3,212,794</b> |
| Shares issued during the year       | 166,482          |
| Shares cancelled during the year    | (491,270)        |
| Shares converted during the year    | -                |
| <b>Closing shares at 31.12.2022</b> | <b>2,888,006</b> |

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

### 12 Contingent assets and liabilities

At 31 December 2022, the Sub-fund had no contingent liabilities or commitments (31 December 2021: £nil).

### 13 Post balance sheet events

As indicated in the accounting policies in Note 1, the investments have been valued at the closing valuation point on 30 December 2022. Since that date, the Sub-fund's quoted price has moved as follows for each share class:

| Share class                  | Price at 30 December 2022 (GBP) | Price at 27 April 2023 (GBP) |
|------------------------------|---------------------------------|------------------------------|
| Class A: Accumulation Retail | 108.6889                        | 110.9096                     |
| Class B: Accumulation Staff  | 110.4151                        | 112.6727                     |

### 14 Direct transaction costs

|                                                | 2022        |         | 2021       |         |
|------------------------------------------------|-------------|---------|------------|---------|
|                                                | £           | %       | £          | %       |
| <b>Analysis of total purchase costs</b>        |             |         |            |         |
| Purchases in the year before transaction costs | 132,817,154 |         | 86,850,863 |         |
| Commission                                     | 16,797      | 0.01%   | 2,961      | 0.00%   |
| Total purchase costs                           | 16,797      | 0.01%   | 2,961      | 0.00%   |
| Total purchases including transaction costs    | 132,833,951 |         | 86,853,824 |         |
| <b>Analysis of total sale costs</b>            |             |         |            |         |
| Sales in the year before transaction costs     | 117,224,230 |         | 53,816,285 |         |
| Commission                                     | (6,381)     | (0.01%) | (6,093)    | (0.01%) |
| Total sale costs                               | (6,381)     | (0.01%) | (6,093)    | (0.01%) |
| Total sales net of transaction costs           | 117,217,849 |         | 53,810,192 |         |

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

|            | 2022   | % of average net | 2021  | % of average net |
|------------|--------|------------------|-------|------------------|
|            | £      | asset value      | £     | asset value      |
| Commission | 23,178 | 0.01%            | 9,054 | 0.01%            |
|            | 23,178 | 0.01%            | 9,054 | 0.01%            |

### 15 Portfolio Dealing Spread

The average portfolio dealing spread at 31 December 2022 is 0.06% (2021: 0.06%)

### 16 Related party transactions

Valu-Trac Investment Management Limited, as ACD is a related party due to its ability to act in respect of the operations of the Sub-fund.

Amounts paid to the ACD and its associates are disclosed in note 4. The amounts due to the ACD and its associates at the balance sheet date are disclosed in note 9.



## DISTRIBUTION TABLES

### Interim distribution in pence per share

Group 1: Shares purchased prior to 01 January 2022

Group 2 : Shares purchased on or after 01 January 2022 and on or before 30 June 2022

01 January 2022 to 30 June 2022

| <b>Class A: Accumulation Retail</b> | <b>Net revenue 31.08.2022</b> | <b>Equalisation</b> | <b>Distribution 31.08.2022</b> | <b>Distribution 31.08.2021</b> |
|-------------------------------------|-------------------------------|---------------------|--------------------------------|--------------------------------|
| Group 1                             | 0.8936p                       | -                   | 0.8936p                        | 1.1828p                        |
| Group 2                             | 0.3927p                       | 0.5009p             | 0.8936p                        | 1.1828p                        |

| <b>Class B: Accumulation Staff</b> | <b>Net revenue 31.08.2022</b> | <b>Equalisation</b> | <b>Distribution 31.08.2021</b> | <b>Distribution 31.08.2021</b> |
|------------------------------------|-------------------------------|---------------------|--------------------------------|--------------------------------|
| Group 1                            | 0.9064p                       | -                   | 0.9064p                        | 1.1951p                        |
| Group 2                            | 0.4368p                       | 0.4696p             | 0.9064p                        | 1.1951p                        |

### Final distribution in pence per share

Group 1: Shares purchased prior to 01 July 2022

Group 2 : Shares purchased on or after 01 July 2022 and on or before 31 December 2022

01 July 2022 to 31 December 2022

| <b>Class A: Accumulation Retail</b> | <b>Net Revenue 28.02.2023</b> | <b>Equalisation</b> | <b>Distribution 28.02.2023</b> | <b>Distribution 28.02.2022</b> |
|-------------------------------------|-------------------------------|---------------------|--------------------------------|--------------------------------|
| Group 1                             | 0.8959p                       | -                   | 0.8959p                        | 0.9196p                        |
| Group 2                             | 0.4073p                       | 0.4886p             | 0.8959p                        | 0.9196p                        |

| <b>Class B: Accumulation Staff</b> | <b>Net Revenue 28.02.2023</b> | <b>Equalisation</b> | <b>Distribution 28.02.2023</b> | <b>Distribution 28.02.2022</b> |
|------------------------------------|-------------------------------|---------------------|--------------------------------|--------------------------------|
| Group 1                            | 0.9085p                       | -                   | 0.9085p                        | 0.9320p                        |
| Group 2                            | 0.3112p                       | 0.5973p             | 0.9085p                        | 0.9320p                        |

### Information for corporate shareholders

A corporate shareholder receives the distribution shown on the voucher enclosed with this report as follows:

- i) 24.11% of the total dividend allocation together with the tax credit is received as franked investment income.
- ii) 75.89% of the dividend allocation is received as an annual payment received after deduction of income tax at the lower rate and is liable to corporation tax. It is not franked investment income.

## SUB-FUND OVERVIEW

---

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name of Sub-fund</b>                 | VT Brompton Adventurous Fund                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Size of Sub-fund</b>                 | £205,213,613                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Launch date</b>                      | 06 January 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Investment objective and policy</b>  | <p>The Sub-fund aims to generate capital growth (i.e. the increase in the value of the shares in the fund) over the longer term (at least 5 years).</p> <p>The composition of the portfolio will reflect the Investment Manager's view of the potential future return of different asset classes and specific investments - for this Sub-fund the Investment Manager aims to take an adventurous approach, with a greater proportion of the fund exposed to assets which it considers 'higher risk' (such as certain equities) and less on those which may be 'lower risk'.</p> <p>The Sub-fund will be actively managed and will typically invest at least 80% of its Net Asset Value in collective investment schemes (including exchange traded funds and investment trusts, and which may include schemes which are managed and / or advised by the ACD and / or Investment Manager).</p> <p>The Sub-fund will generally be exposed to equity markets. However, the Sub-fund will also have exposure (directly or indirectly) to other asset classes such as fixed income and alternatives (including, but not limited to, UCITS Long Short funds, market neutral funds and structured products), although exposure to such assets will not exceed 35% of the Net Asset Value of the Sub-fund except in exceptional circumstances (e.g. where the Investment Manager anticipates sharp falls in asset values due to severe market stress).</p> <p>The Sub-fund may also invest directly in other transferable securities (Including equities), money market instruments, cash and near cash.</p> <p>Investments will not be confined by geographical, industrial or economic sector.</p> <p>Derivatives may be used only for Efficient Portfolio Management (including hedging) in accordance with the FCA Rules. Efficient portfolio management means using derivatives in a way that is designed to reduce risk or cost and/or generate extra income or growth. Derivative use is expected to be limited.</p> |
| <b>Performance comparator</b>           | <p>The Sub-fund is not managed to or constrained by a benchmark, and nor does the ACD use a benchmark in order to assess performance.</p> <p>However, many funds sold in the UK are grouped into sectors by the Investment Association (the "IA") (the trade body that represents UK investment managers), to help investors to compare funds with broadly similar characteristics.</p> <p>In order to assess the Sub-fund's performance, investors may find it useful to compare the Sub-fund against the performance IA Flexible Sector, which serves as a method of comparing the Fund's performance with other funds which have broadly similar characteristics.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Ex-distribution dates</b>            | 30 June and 31 December                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Distribution dates</b>               | 31 August and last day of February                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Individual Savings Account (ISA)</b> | The Sub-fund is a qualifying investment for inclusion in an ISA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Share Classes</b>                    | Class A: Accumulation Retail<br>Class B: Accumulation Staff                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## SUB-FUND OVERVIEW (continued)

---

### Minimum investment\*

|                        |                                                                                                                                                           |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Lump sum subscription: | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Top-up:                | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Holding:               | Class A: Accumulation Retail = £1,000<br>Class B: Accumulation Staff = £1,000                                                                             |
| Redemption:            | Class A: Accumulation Retail = N/A (provided minimum holding is maintained)<br>Class B: Accumulation Staff = N/A (provided minimum holding is maintained) |
| Switching:             | Class A: Accumulation Retail = N/A (provided minimum holding is maintained)<br>Class B: Accumulation Staff = N/A (provided minimum holding is maintained) |

\*The ACD may waive the minimum levels at its discretion.

The Class B shares are only available to employees of the Sub-fund's sponsor, Grosvenor Consultancy Asset Management Limited, or otherwise at the ACD's discretion.

### Initial, redemption and switching charges Nil

### Annual management charges

|                                    |                                                                             |
|------------------------------------|-----------------------------------------------------------------------------|
| The annual management charges are: | Class A: Accumulation Retail = 0.65%<br>Class B: Accumulation Staff = 0.45% |
|------------------------------------|-----------------------------------------------------------------------------|

The above percentages being percentages of the net asset value of the Sub-fund attributable to the relevant share class (plus VAT if applicable).

### Changes to Sub-fund

From 11 November 2022, expenses of the Sub-fund are taken from income as opposed to capital prior to this date.

On 11 November 2022, some clarifications were made to the investment objective and policy wording to that above. In particular, the volatility target for the Sub-fund was removed from the objectives as it is considered that this target may actually lead to the investment manager taking a higher degree of risk than would otherwise be desired or appropriate, irrespective of the investment manager's view of the potential future return of different asset classes. These amendments are not expected to result in any change to the way in which the sub-funds operate or the investments which each makes.

On 12 December 2022, the Sub-fund changed its name from VT Grosvenor Adventurous Fund to VT Brompton Adventurous Fund.

## INVESTMENT MANAGER'S REVIEW

---

The A Accumulation share class of the VT Brompton Adventurous fund fell 11.76% over the year to 31 December 2022 while the IA Flexible Investment Total Return sector fell 9.21%.

Global equities and bonds fell 7.62% and 5.70% respectively in sterling over the year under review in response to the Russia-Ukraine war, China's zero-Covid-19 lockdown policies, rising inflation and interest rate expectations and deteriorating economic prospects. Inflation was fuelled by higher energy prices, supply constraints and tight labour markets. US consumer price inflation peaked at 9.1% in June, its highest level since 1982, before falling to 6.5% in December. UK and eurozone inflation also retreated from peaks but December figures continued to cause concern among investors at 10.5% and 9.2% respectively. Starting at near zero, central banks tightened monetary policy through a series of interest rate rises as they attempted to control inflation. In December, the Federal Reserve, European Central Bank and Bank of England increased their official interest rates by half a percentage point, taking them to 4.25-4.5%, 2% and 3.5% respectively. Investors took comfort from moderating inflation and leading indicators that pointed to economic weakness. This implied that the peak in the interest rate cycle would be lower than feared. As a result, equities started to recover near the year end. The International Monetary Fund forecasted global economic growth to slow to 2.7% in 2023, with UK growth forecast at just 0.3%, a consequence of above-average inflation and tighter monetary conditions.

Global growth stocks fell 19.43% in sterling while value stocks rose 4.87%. Within the Adventurous portfolio, growth-oriented holdings such as Fundsmith Equity and Blackrock European Dynamic were sold because of the negative impact of rising interest rates as investors de-rated highly-valued 'growth stocks' in response to rising bond yields. Polar Capital Global Insurance and the Xtrackers MSCI World Health Care exchange-traded fund (ETF) were added because slowing economic growth and recession risk warranted defensive equity positions in companies that are typically less sensitive to changes in macroeconomic conditions. These companies also tend to be more resilient because of the low substitutability of their goods and services. Within the alternative investments allocation, daily-traded long-short equity holdings provided protection and diversification in an environment where both bonds and equities were falling. Gold rose 11.77% in sterling over the year as investors sought safe-haven investments.

Following the UK government's announcement of unfunded tax cuts, sterling briefly reached a \$1.03 historic low. The BoE intervened to restore market stability by carrying out temporary purchases of long-dated UK government bonds and the tax cuts were reversed. Gilts fell 25.02% over the year as the BoE raised interest rates, while sterling investment-grade corporate and high-yield bonds fell 18.37% and 11.03% respectively. The portfolio had no investments in funds dedicated to gilts. The portfolio was underweight in bonds and maintained a short duration bias for the early months of the year under review. A sterling-hedged iShares \$ Treasury Bond 7-10 Years ETF holding and Vanguard Global Bond were added in May because longer-dated government bonds appeared attractive with US 10-year treasury bond yields close to 3% while credit exposure was topped up during the second half of the year.

The UK stockmarket was relatively resilient, up 1.16% thanks to its large sector weightings in energy, materials and healthcare. UK smaller companies fell 17.87%, however, as prospects for domestic conditions deteriorated. Chelverton UK Equity Growth, a small company specialist holding, was sold in the first half of the year but reintroduced later because valuations appeared attractive following a period of weak performance.

China's zero-covid-19 lockdown policies and dollar strength negatively affected equities in Asia excluding Japan and emerging markets. Vietnam Enterprise Investments suffered particularly, falling 23.79% following a government crackdown on corruption in local financial markets. Vietnam's longer-term prospects, however, appear strong. Lindsell Train Japanese Equity was topped up because it owns consumer stocks that appear attractive and may perform well as Japan's economy continues to recover from the pandemic.

Towards the year end, defensive investments in areas such as long-short equity and healthcare were sold in favour of equities and corporate bonds that appeared relatively cheap having performed poorly. In particular, holdings in Asian and emerging market equities were added to benefit from tailwinds coming from China's easing of lockdown restrictions and moderating inflation, which may prompt the Fed to become less hawkish, a change that would be likely to weaken the dollar.

Brompton Asset Management LLP  
Investment Manager to the Fund  
27 January 2023

Source: Refinitiv Lipper; global equities: MSCI AC World TR, global bonds: Bloomberg Barclays Global Aggregate Bond TR, oil: S&P GSCI Crude Oil TR, commodities: S&P GSCI TR, gilts: Markit iBoxx Sterling Gilts Overall TR, sterling corporates: Markit iBoxx Sterling Corporates TR, sterling high yields: ICE BofAML Sterling High Yield TR GBP, growth equities: MSCI AC World Growth TR, value equities: MSCI AC World Value TR, UK equities: MSCI United Kingdom All Cap TR, UK smaller companies: Numis Smaller Companies (-InvTrust) TR, Asia ex Japan equities: MSCI AC Asia ex Japan TR, emerging market equities: MSCI EM (Emerging Markets) TR, gold: S&P GSCI Gold TR.

## PERFORMANCE RECORD

### Financial Highlights

#### Class A: Accumulation Retail

|                                              | Year to 31<br>December 2022 | Year to 31<br>December 2021 | Year to 31<br>December 2020 |
|----------------------------------------------|-----------------------------|-----------------------------|-----------------------------|
| Changes in net assets per share              | GBP                         | GBP                         | GBP                         |
| Opening net asset value per share            | 148.0128                    | 133.2135                    | 119.3574                    |
| Return before operating charges              | (15.5463)                   | 16.6976                     | 15.5736                     |
| Operating charges (note 1)                   | (1.8529)                    | (1.8983)                    | (1.7175)                    |
| Return after operating charges *             | (17.3992)                   | 14.7993                     | 13.8561                     |
| Closing net asset value per share            | 130.6136                    | 148.0128                    | 133.2135                    |
| Retained distributions on accumulated shares | 1.6865                      | 1.3082                      | 1.0559                      |
| *after direct transactions costs of:         | 0.0279                      | 0.0205                      | 0.0268                      |
| Performance                                  |                             |                             |                             |
| Return after charges                         | (11.76%)                    | 11.11%                      | 11.61%                      |
| Other information                            |                             |                             |                             |
| Closing net asset value                      | £197,291,559                | £211,033,887                | £164,740,542                |
| Closing number of shares                     | 151,049,739                 | 142,578,125                 | 123,666,538                 |
| Operating charges (note 2)                   | 1.33%                       | 1.35%                       | 1.36%                       |
| Direct transaction costs                     | 0.02%                       | 0.01%                       | 0.02%                       |
| Prices                                       |                             |                             |                             |
| Highest share price                          | 148.4799                    | 151.0490                    | 139.0775                    |
| Lowest share price                           | 126.2095                    | 132.8226                    | 93.8012                     |

^Share class launched 06 January 2017

#### Class B: Accumulation Staff

|                                              | Year to 31<br>December 2022 | Year to 31<br>December 2021 | Year to 31<br>December 2020 |
|----------------------------------------------|-----------------------------|-----------------------------|-----------------------------|
| Changes in net assets per share              | GBP                         | GBP                         | GBP                         |
| Opening net asset value per share            | 149.4128                    | 134.2531                    | 120.0508                    |
| Return before operating charges              | (15.7728)                   | 16.7908                     | 15.6773                     |
| Operating charges (note 1)                   | (1.5903)                    | (1.6311)                    | (1.4750)                    |
| Return after operating charges *             | (17.3631)                   | 15.1597                     | 14.2023                     |
| Closing net asset value per share            | 132.0497                    | 149.4128                    | 134.2531                    |
| Retained distributions on accumulated shares | 1.6948                      | 1.3176                      | 1.0628                      |
| *after direct transactions costs of:         | 0.0281                      | 0.0207                      | 0.0269                      |
| Performance                                  |                             |                             |                             |
| Return after charges                         | (11.62%)                    | 11.29%                      | 11.83%                      |
| Other information                            |                             |                             |                             |
| Closing net asset value                      | £7,993,478                  | £8,341,639                  | £5,897,645                  |
| Closing number of shares                     | 6,053,384                   | 5,582,948                   | 4,392,931                   |
| Operating charges (note 2)                   | 1.13%                       | 1.15%                       | 1.16%                       |
| Direct transaction costs                     | 0.02%                       | 0.01%                       | 0.02%                       |
| Prices                                       |                             |                             |                             |
| Highest share price                          | 149.8884                    | 152.4401                    | 140.1983                    |
| Lowest share price                           | 127.5889                    | 133.8821                    | 94.3880                     |

## PERFORMANCE RECORD (Continued)

---

1. The operating charges per share figure is calculated by applying the operating charges percentage to the average net asset valuation per share throughout the period.
2. The operating charges percentage is based on the expenses incurred during the period annualised, as a proportion of the average net asset value of the Sub-fund plus the costs of the underlying holdings.

### Risk Profile

Based on past data, the Sub-fund is ranked a '5' on the synthetic risk and reward indicator scale (of 1 to 7) as described fully in the Key Investor Information Document. The Sub-fund is ranked 5 because funds of this type have experienced relatively high rises and falls in market prices historically (31 December 2022: ranked 5). The higher the rank, the greater the potential reward but the greater the risk of losing money.

## PORTFOLIO SUMMARY

As at 31 December 2022

| Holding                                              | FUNDS & TRUSTS                             | Value £            | % of<br>net assets |
|------------------------------------------------------|--------------------------------------------|--------------------|--------------------|
| 693,000                                              | 3i Infrastructure PLC                      | 2,297,295          | 1.12               |
| 302,777                                              | Aberforth Smaller Companies Trust PLC      | 3,960,323          | 1.93               |
| 1,984,837                                            | Balanced Commercial Property Trust Limited | 1,766,505          | 0.86               |
| 105,791                                              | Baillie Gifford Japanese Smaller Companies | 4,064,507          | 1.98               |
| 908,562                                              | Baillie Gifford Pacific                    | 7,801,823          | 3.80               |
| 7,846,207                                            | Fidelity Index US                          | 25,684,558         | 12.52              |
| 87,110                                               | Goldman Sachs India Equity Portfolio       | 1,932,104          | 0.94               |
| 396,220                                              | Guinness Global Equity Income              | 7,356,220          | 3.58               |
| 37,800                                               | iShares Core S&P 500 UCITS ETF             | 12,450,564         | 6.07               |
| 147,894                                              | iShares Physical Gold ETC                  | 4,351,041          | 2.12               |
| 545,249                                              | iShares Gold Producers UCITS ETF           | 5,697,852          | 2.78               |
| 93,249                                               | iShares Core MSCI World UCITS ETF          | 5,672,337          | 2.76               |
| 808,704                                              | iShares \$ Treasury Bond 7-10y UCITS ETF   | 3,598,733          | 1.75               |
| 207,409                                              | Janus Henderson European Smaller Companies | 7,470,874          | 3.64               |
| 5,589,235                                            | FTF Martin Currie European Unconstrained   | 7,959,070          | 3.88               |
| 2,975,295                                            | LF Lightman European                       | 4,379,635          | 2.13               |
| 4,087,105                                            | Lindsell Train Japanese Equity             | 9,779,215          | 4.77               |
| 47,350                                               | Man GLG Asia (ex Japan) Equity             | 5,422,003          | 2.64               |
| 3,109,865                                            | Man GLG Japan Core Alpha                   | 6,630,232          | 3.23               |
| 8,885,834                                            | Man GLG Undervalued Assets                 | 12,511,254         | 6.10               |
| 601,019                                              | Matthews Asia Funds-Asia ex Jap Dividend   | 7,284,350          | 3.55               |
| 1,955,884                                            | MI Chelverton UK Equity Growth             | 6,107,697          | 2.98               |
| 1,086,526                                            | Chrysalis Investments Ltd                  | 822,500            | 0.40               |
| 1,570,818                                            | Liontrust Special Situations Fund          | 7,275,401          | 3.55               |
| 510,736                                              | Polar Capital Global Insurance             | 5,248,220          | 2.56               |
| 164,623                                              | Polar Capital Global Technology            | 7,994,084          | 3.90               |
| 39,999                                               | RWC Global Emerging Markets                | 8,201,738          | 4.00               |
| 99,786                                               | Schroder ISF Strategic Credit              | 12,286,004         | 5.99               |
| 32,264                                               | Vanguard Global Bond Index                 | 3,784,531          | 1.84               |
| 467,513                                              | Vietnam Enterprise Investments Limited     | 2,716,250          | 1.32               |
| <b>Portfolio of investments (31.12.2021: 95.83%)</b> |                                            | <b>202,506,920</b> | <b>98.69</b>       |
| <b>Net other assets (31.12.2021: 4.22%)</b>          |                                            | <b>2,706,693</b>   | <b>1.31</b>        |
|                                                      |                                            | <b>205,213,613</b> | <b>100.00</b>      |

Note: The 31 December 2021 comparators percentages are based on Mid pricing and does not add up to 100%. The Mid to Bid adjustment for the year ended 31 December 2021 was (0.05%).

## SUMMARY OF MATERIAL PORTFOLIO CHANGES

|                                                 | £                  |
|-------------------------------------------------|--------------------|
| <b>Total purchases for the year (note 14)</b>   | <b>187,672,975</b> |
| 3i Infrastructure PLC                           | 2,073,560          |
| Aberforth Smaller Companies Trust PLC           | 2,531,353          |
| Artemis UK Special Situations                   | 2,121,447          |
| Baillie Gifford Japanese Smaller Companies      | 3,079,583          |
| Baillie Gifford Pacific                         | 6,917,763          |
| Balanced Commercial Property Trust Limited      | 2,177,123          |
| BlackRock European Absolute Alpha               | 1,053,994          |
| BlackRock Natural Resources Growth & Income     | 9,269,015          |
| Chrysalis Investments Ltd                       | 574,583            |
| Fidelity Index                                  | 2,095,012          |
| FTF Martin Currie European Unconstrained        | 5,949,568          |
| Goldman Sachs Emerging Markets Equity Portfolio | 2,080,389          |
| Goldman Sachs India Equity Portfolio            | 2,101,098          |
| Guinness Global Equity Income                   | 7,163,610          |
| iShares \$ Treasury Bond 7-10y UCITS ETF        | 8,329,885          |
| iShares Core FTSE 100 UCITS ETF                 | 3,698,084          |
| iShares Core MSCI World UCITS ETF               | 9,891,381          |
| iShares Core S&P 500 UCITS ETF                  | 6,449,497          |
| iShares Edge MSCI World Value Factor UCITS ETF  | 8,583,122          |
| iShares Gold Producers UCITS ETF                | 5,148,204          |
| iShares Physical Gold ETC                       | 3,251,183          |
| iShares S&P 500 Financials Sector UCITS ETF     | 4,359,975          |
| Janus Henderson European Smaller Companies      | 2,147,107          |
| LF Lightman European                            | 4,155,000          |
| Lindsell Train Japanese Equity                  | 4,199,685          |
| Liontrust Special Situations Fund               | 4,227,807          |
| Man GLG Asia (ex Japan) Equity IF               | 5,130,051          |
| Man GLG Japan CoreAlpha                         | 6,250,829          |
| Man GLG UK Absolute Value                       | 1,034,464          |
| MI Chelverton UK Equity Growth                  | 6,296,050          |
| MI Chelverton UK Equity Income                  | 630,795            |
| Picton Property Income Ltd                      | 2,200,616          |
| Polar Capital Global Insurance                  | 8,260,001          |
| Polar Capital Global Technology                 | 5,194,158          |
| RWC Global Emerging Markets                     | 8,303,968          |
| Schroder ISF Asian Total Return                 | 2,258,587          |
| Schroder ISF Strategic Credit                   | 10,455,067         |
| Vanguard Global Bond Index                      | 8,337,215          |
| Vietnam Enterprise Investments Limited          | 1,219,066          |
| Xtrackers MSCI World Health Care UCITS ETF      | 8,473,080          |

The above transactions represent all of the purchases during the year.



## SUMMARY OF MATERIAL PORTFOLIO CHANGES

---

|                                                 | £                  |
|-------------------------------------------------|--------------------|
| <b>Total sales for the year (note 14)</b>       | <b>168,851,089</b> |
| Artemis UK Special Situations                   | 11,148,842         |
| Baillie Gifford Pacific                         | 4,238,041          |
| Balanced Commercial Property Trust Limited      | 1,233,517          |
| BlackRock European Absolute Alpha               | 5,110,506          |
| BlackRock European Dynamic                      | 11,395,173         |
| BlackRock Natural Resources Growth & Income     | 10,272,886         |
| FTF Martin Currie European Unconstrained        | 3,364,155          |
| Fundsmith Equity                                | 5,235,416          |
| Goldman Sachs Emerging Markets Equity Portfolio | 5,208,955          |
| Goldman Sachs India Equity Portfolio            | 2,229,634          |
| iShares \$ Treasury Bond 7-10y UCITS ETF        | 4,211,400          |
| iShares Core FTSE 100 UCITS ETF                 | 3,670,946          |
| iShares Core MSCI World UCITS ETF               | 4,120,616          |
| iShares Core S&P 500 UCITS ETF                  | 4,165,938          |
| iShares Edge MSCI World Value Factor UCITS ETF  | 11,801,485         |
| iShares Gold Producers UCITS ETF                | 1,550,617          |
| iShares Physical Gold ETC                       | 5,961,378          |
| iShares S&P 500 Financials Sector UCITS ETF     | 3,970,470          |
| Man GLG UK Absolute Value                       | 5,321,848          |
| MI Chelverton UK Equity Growth                  | 6,309,611          |
| MI Chelverton UK Equity Income                  | 2,974,727          |
| Nippon Active Value Fund PLC                    | 1,535,426          |
| Picton Property Income Ltd                      | 3,070,727          |
| Polar Capital Global Insurance                  | 4,183,910          |
| Schroder ISF Asian Total Return                 | 2,096,521          |
| Schroder ISF Strategic Credit                   | 5,204,308          |
| T. Rowe Jap Equity                              | 3,614,548          |
| TR Property Investment Trust PLC                | 2,666,730          |
| Troy Trojan                                     | 4,864,744          |
| Vanguard Global Bond Index                      | 4,166,777          |
| Vulcan Value Equity                             | 14,758,279         |
| Xtrackers MSCI World Health Care UCITS ETF      | 9,192,958          |

The above transactions represent all of the sales during the year.

## STATEMENT OF TOTAL RETURN

For the year ended 31 December

|                                                                                      |       | 2022           |                     | 2021            |                    |
|--------------------------------------------------------------------------------------|-------|----------------|---------------------|-----------------|--------------------|
|                                                                                      | Notes | £              | £                   | £               | £                  |
| Income                                                                               |       |                |                     |                 |                    |
| Net capital (losses)/gains                                                           | 2     |                | (27,998,983)        |                 | 19,693,345         |
| Revenue                                                                              | 3     | 3,079,550      |                     | 1,873,854       |                    |
| Expenses                                                                             | 4     | (1,438,982)    |                     | (1,358,265)     |                    |
| Interest payable and similar charges                                                 | 6     | <u>(2,593)</u> |                     | <u>(29,840)</u> |                    |
| Net revenue before taxation                                                          |       | 1,637,975      |                     | 485,749         |                    |
| Taxation                                                                             | 5     | <u>-</u>       |                     | <u>-</u>        |                    |
| Net revenue after taxation                                                           |       |                | <u>1,637,975</u>    |                 | <u>485,749</u>     |
| Total return before distributions                                                    |       |                | (26,361,008)        |                 | 20,179,094         |
| Finance costs: distributions                                                         | 6     |                | <u>(2,597,898)</u>  |                 | <u>(1,786,100)</u> |
| <b>Changes in net assets attributable to shareholders from investment activities</b> |       |                | <u>(28,958,906)</u> |                 | <u>18,392,994</u>  |

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO SHAREHOLDERS

For the year ended 31 December

|                                                                                           | 2022                | 2021               |
|-------------------------------------------------------------------------------------------|---------------------|--------------------|
|                                                                                           | £                   | £                  |
| <b>Opening net assets attributable to shareholders</b>                                    | 219,273,252         | 170,534,797        |
| Amounts receivable on creation of shares                                                  | 27,049,410          | 47,393,974         |
| Amounts payable on cancellation of shares                                                 | (14,802,779)        | (18,893,950)       |
| Accumulation dividends retained                                                           | 2,652,636           | 1,845,437          |
| Changes in net assets attributable to shareholders from investment activities (see above) | <u>(28,958,906)</u> | <u>18,392,994</u>  |
| <b>Closing net assets attributable to shareholders</b>                                    | <u>205,213,613</u>  | <u>219,273,252</u> |

**BALANCE SHEET**

---

| As at                                          | Notes | 31.12.2022       |                    | 31.12.2021       |                    |
|------------------------------------------------|-------|------------------|--------------------|------------------|--------------------|
|                                                |       | £                | £                  | £                | £                  |
| <b>FIXED ASSETS</b>                            |       |                  |                    |                  |                    |
| Investment assets                              |       |                  | 202,506,920        |                  | 210,039,369        |
| <b>Current assets</b>                          |       |                  |                    |                  |                    |
| Debtors                                        | 7     | 195,092          |                    | 642,567          |                    |
| Cash and bank balances                         | 8     | <u>4,562,274</u> |                    | <u>9,130,702</u> |                    |
| <b>Total current assets</b>                    |       |                  | <u>4,757,366</u>   |                  | <u>9,773,269</u>   |
| <b>Total assets</b>                            |       |                  | 207,264,286        |                  | 219,812,638        |
| <b>CURRENT LIABILITIES</b>                     |       |                  |                    |                  |                    |
| <b>Creditors</b>                               |       |                  |                    |                  |                    |
| Bank overdraft                                 | 8     | (1,369,401)      |                    | (397,083)        |                    |
| Creditors                                      | 9     | <u>(681,272)</u> |                    | <u>(142,303)</u> |                    |
| <b>Total current liabilities</b>               |       |                  | <u>(2,050,673)</u> |                  | <u>(539,386)</u>   |
| <b>Net assets attributable to shareholders</b> |       |                  | <u>205,213,613</u> |                  | <u>219,273,252</u> |

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

---

### 1 Accounting policies

Please revert to pages 7 for accounting policies.

| <b>2 Net capital (losses)/gains</b>      | <b>2022</b>         | <b>2021</b>       |
|------------------------------------------|---------------------|-------------------|
| The net capital (losses)/gains comprise: | £                   | £                 |
| Non-derivative securities (losses)/gains | (27,970,354)        | 19,685,995        |
| Currency (losses)/gains                  | (27,278)            | 6,177             |
| Transaction charges (custodian)          | (1,351)             | 1,173             |
| Total net capital (losses)/gains         | <u>(27,998,983)</u> | <u>19,693,345</u> |

| <b>3 Revenue</b>                      | <b>2022</b>      | <b>2021</b>      |
|---------------------------------------|------------------|------------------|
|                                       | £                | £                |
| Non-taxable dividends                 | 2,359,531        | 1,363,082        |
| Property income distributions (PIDs)  | 221,064          | 80,497           |
| Interest on non-derivative securities | 472,143          | 427,962          |
| Bank interest                         | 26,812           | 2,313            |
| Total revenue                         | <u>3,079,550</u> | <u>1,873,854</u> |

| <b>4 Expenses</b> | <b>2022</b> | <b>2021</b> |
|-------------------|-------------|-------------|
|                   | £           | £           |

**Payable to the Authorised Corporate Director,  
associates of the Authorised Corporate Director,  
and agents of either of them:**

|                          |                  |                  |
|--------------------------|------------------|------------------|
| Annual management charge | <u>1,332,584</u> | <u>1,262,342</u> |
|--------------------------|------------------|------------------|

**Payable to the depositary, associates of the  
depositary, and agents of either of them:**

|                  |               |               |
|------------------|---------------|---------------|
| Depositary fee   | 67,948        | 64,427        |
| Safe custody fee | 20,001        | 14,518        |
|                  | <u>87,949</u> | <u>78,945</u> |

**Other expenses:**

|                |               |               |
|----------------|---------------|---------------|
| Audit fee      | 7,790         | 7,074         |
| FCA fee        | 52            | 54            |
| Other expenses | 10,607        | 9,850         |
|                | <u>18,449</u> | <u>16,978</u> |

|                |                  |                  |
|----------------|------------------|------------------|
| Total expenses | <u>1,438,982</u> | <u>1,358,265</u> |
|----------------|------------------|------------------|

NOTES TO THE FINANCIAL STATEMENTS (Continued)

| 5 Taxation                                                                                                                                                                                 | 2022      | 2021      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
|                                                                                                                                                                                            | £         | £         |
| <b>(a) Analysis of charge in the year</b>                                                                                                                                                  |           |           |
| UK Corporation tax                                                                                                                                                                         | -         | -         |
| Total tax charge for the year (note 5b)                                                                                                                                                    | -         | -         |
| <b>(b) Factors affecting current tax charge for the year</b>                                                                                                                               |           |           |
| The tax assessed for the year is lower than the standard rate of corporation tax in the UK for an open-ended investment company 20.00% (2021:20.00%). The differences are explained below: |           |           |
| Net revenue before taxation                                                                                                                                                                | 1,637,975 | 485,749   |
| Corporation tax at 20.00% (2021:20.00%)                                                                                                                                                    | 327,595   | 97,150    |
| <u>Effects of:</u>                                                                                                                                                                         |           |           |
| Revenue not subject to UK corporation tax                                                                                                                                                  | (471,906) | (272,617) |
| Current year expenses not utilised                                                                                                                                                         | 144,311   | 175,467   |
| Total tax charge for the year (note 5a)                                                                                                                                                    | -         | -         |

**(c) Provision for deferred taxation**

At 31 December 2022 there is a potential deferred tax asset of £815,448 (31 December 2021: £671,137) in relation to surplus management expenses. It is unlikely the Sub-fund will generate sufficient taxable profits in the future to utilise this amount and therefore no deferred tax asset has been recognised.

| 6 Finance costs                                 | 2022      | 2021      |
|-------------------------------------------------|-----------|-----------|
|                                                 | £         | £         |
| Interim dividend distribution                   | 1,807,893 | 1,191,026 |
| Final dividend distribution                     | 844,743   | 654,411   |
|                                                 | 2,652,636 | 1,845,437 |
| Add: Revenue deducted on cancellation of shares | 56,964    | 47,978    |
| Deduct: Revenue received on issue of shares     | (111,702) | (107,315) |
| <b>Net distribution for the year</b>            | 2,597,898 | 1,786,100 |
| Interest payable and similar charges            | 2,593     | 29,840    |
| <b>Total finance costs</b>                      | 2,600,491 | 1,815,940 |
| <b>Reconciliation of distributions</b>          |           |           |
| Net revenue after taxation                      | 1,637,975 | 485,749   |
| Expenses paid from capital                      | 1,239,484 | 1,358,265 |
| Relief on expenses allocated to capital         | (143,485) | (96,186)  |
| Balance brought forward                         | 336,263   | 374,535   |
| Balance carried forward                         | (472,339) | (336,263) |
| <b>Net distribution for the year</b>            | 2,597,898 | 1,786,100 |

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

| <b>7 Debtors</b>                                 | <b>31.12.2022</b> | <b>31.12.2021</b> |
|--------------------------------------------------|-------------------|-------------------|
|                                                  | £                 | £                 |
| Amounts receivable on creation of shares         | 79,919            | 551,551           |
| Accrued revenue:                                 |                   |                   |
| Non-taxable dividends receivable                 | 50,287            | 69,966            |
| Interest on non-derivative securities receivable | 54,668            | 17,485            |
| Property income distributions receivable         | 7,939             | 3,565             |
| Prepayments                                      | 2,279             | -                 |
| <b>Total debtors</b>                             | <b>195,092</b>    | <b>642,567</b>    |

| <b>8 Cash and bank balances</b> | <b>31.12.2022</b> | <b>31.12.2021</b> |
|---------------------------------|-------------------|-------------------|
|                                 | £                 | £                 |
| Cash and bank balances          | 4,562,274         | 9,130,702         |
| Bank overdraft                  | (1,369,401)       | (397,083)         |

| <b>9 Creditors</b>                                                                                                                  | <b>31.12.2022</b> | <b>31.12.2021</b> |
|-------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|
|                                                                                                                                     | £                 | £                 |
| Amounts payable on cancellation of shares                                                                                           | 534,788           | 7,838             |
| <b>Payable to the Authorised Corporate Director, associates of the Authorised Corporate Director, and agents of either of them:</b> |                   |                   |
| Annual management charge                                                                                                            | 109,193           | 118,108           |
| <b>Payable to the depositary, associates of the depositary, and agents of either of them:</b>                                       |                   |                   |
| Depositary's fees                                                                                                                   | 6,066             | 6,403             |
| Safe custody and other custodian charges                                                                                            | 20,593            | 2,409             |
|                                                                                                                                     | 26,659            | 8,812             |
| Other accrued expenses                                                                                                              | 10,632            | 7,545             |
| <b>Total creditors</b>                                                                                                              | <b>681,272</b>    | <b>142,303</b>    |

## 10 Risk management policies

In pursuing its investment objective as stated on page 24, the Sub-fund holds a number of financial instruments. The Sub-fund's financial instruments comprise securities and other investments, cash balances, debtors and creditors that arise directly from its operations, for example, in respect of sales and purchases awaiting settlement, amounts receivable for issues and payable for redemptions and debtors for accrued revenue.

The main risks arising from the Sub-fund's financial instruments, those of its underlying holdings and the ACD's policies for managing these risks are summarised below. These policies have been applied throughout the year.

### Market price risk

Market price risk is the risk that the value of the Sub-fund's investment holdings will fluctuate as a result of changes in market prices caused by factors other than interest rate or foreign currency movement. Market price risk arises mainly from uncertainty about future prices of financial instruments the Sub-fund holds. It represents the potential loss the Sub-fund might suffer through holding market positions in the face of price movements.

The Sub-fund's investment portfolio is exposed to market price fluctuations, which are monitored by the ACD in pursuance of the investment objective and policy as set out in the Prospectus.

Adherence to investment guidelines and to investment and borrowing powers set out in the Instrument of Incorporation, the Prospectus and in the rules of the Financial Conduct Authority's Collective Investment Schemes Sourcebook mitigates the risk of excessive exposure to any particular type of security or issuer.

If market prices at the balance sheet date had been 10% higher or lower while all other variables remained constant, the return attributable to ordinary shareholders and equity for the year ended 31 December 2022 would have increased/decreased by £20,250,692 (31 December 2021: £21,003,937).

**10 Risk management policies (continued)**

**Foreign currency risk**

Foreign currency risk is the risk that the value of the Sub-fund's investment holdings will fluctuate as a result of changes in foreign currency exchange rates.

The Sub-fund's investment portfolio is partly invested in collective investment schemes that are registered overseas and also collective investment schemes that invest in overseas securities and the balance sheet can be affected by movements in foreign exchange rates. The ACD may seek to manage exposure to currency movements by using forward exchange contracts or by hedging the Sterling value of investments that are priced in other currencies. Revenue received in other currencies is converted to Sterling on or near the date of receipt.

Net currency assets and liabilities consist of:

|              | Net monetary assets and liabilities |                  | Non-monetary assets and liabilities |                    | Total net assets   |                    |
|--------------|-------------------------------------|------------------|-------------------------------------|--------------------|--------------------|--------------------|
|              | £                                   |                  | £                                   |                    | £                  |                    |
|              | 31.12.2022                          | 31.12.2021       | 31.12.2022                          | 31.12.2021         | 31.12.2022         | 31.12.2021         |
| Sterling     | 2,706,693                           | 9,233,883        | 202,506,920                         | 210,039,369        | 205,213,613        | 219,273,252        |
| <b>Total</b> | <b>2,706,693</b>                    | <b>9,233,883</b> | <b>202,506,920</b>                  | <b>210,039,369</b> | <b>205,213,613</b> | <b>219,273,252</b> |

**Interest rate risk**

Interest rate risk is the risk to portfolio value due to changes in interest rates. The magnitude of the exposure from an adverse change in interest rates depends on the sensitivity of the instrument to changes in interest rates as well as the absolute change in interest rates. In general, values of long-term instruments are more sensitive to interest rate changes than the values of short-term instruments.

The Sub-fund takes on interest rate risk when the investment manager believes the expected returns compensate for the risk, limited by the investment objective, policy and any prospectus rules. The investment manager monitors the level of interest rate risk in the fund on a regular basis. In addition any cash deposits in the sub-fund are linked to SONIA, ensuring interest income increases as interest rates increase.

The table below details the interest rate risk profile at the balance sheet date:

|                                                        | 31.12.2022         | 31.12.2021         |
|--------------------------------------------------------|--------------------|--------------------|
|                                                        | £                  | £                  |
| Financial assets floating rate                         | 4,562,274          | 9,130,702          |
| Financial assets interest bearing instruments          | 19,669,268         | -                  |
| Financial assets non-interest bearing instruments      | 183,032,744        | 210,681,936        |
| Financial liabilities non-interest bearing instruments | (681,272)          | (142,303)          |
| Financial liabilities floating rate                    | (1,369,401)        | (397,083)          |
|                                                        | <b>205,213,613</b> | <b>219,273,252</b> |

**Liquidity risk**

The Sub-fund's assets comprise mainly of readily realisable securities. The main liability of the Sub-fund is the redemption of any shares that the investors wish to sell. Assets of the Sub-fund may need to be sold if insufficient cash is available to finance such redemptions.

**Credit risk**

Certain transactions in securities that the Sub-fund enters into expose it to the risk that the counterparty will not deliver the investment for a purchase, or cash for a sale after the Sub-fund has fulfilled its responsibilities. The Sub-fund only buys and sells investments through brokers which have been approved by the ACD as acceptable counterparties and fund management companies. In addition, limits are set to the exposure to any individual broker that may exist at any time and changes in broker's financial ratings are reviewed.

Credit risk also arises on cash held within financial institutions. Credit risk on cash balances is mitigated by ensuring that cash is held with financial institutions that are at least investment grade credit related. Indirect credit risk arises from holdings in collectives that invest in debt securities as any default or perceived risk of default will affect the valuation of such holdings.

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

### 10 Risk management policies (continued)

#### Fair value disclosure

The fair value hierarchy is intended to prioritise the inputs that are used to measure the fair value of assets and liabilities. The highest priority is given to quoted prices and the lowest to un-observable inputs. The criteria applied to the fair values levels in these financial statements are as follows:

Level 1: Unadjusted quoted price in an active market for an identical instrument;

Level 2: Valuation techniques using observable inputs other than quoted prices within level 1;

Level 3: Valuation techniques using unobservable inputs.

| Valuation Technique                                                                           | 31.12.2022         |                         | 31.12.2021         |                         |
|-----------------------------------------------------------------------------------------------|--------------------|-------------------------|--------------------|-------------------------|
|                                                                                               | Assets<br>(£000's) | Liabilities<br>(£000's) | Assets<br>(£000's) | Liabilities<br>(£000's) |
| Level 1: Unadjusted quoted price in an active market for an identical instrument              | 43,333             | -                       | 37,416             | -                       |
| Level 2: Valuation techniques using observable inputs other than quoted prices within level 1 | 159,174            | -                       | 172,623            | -                       |
| Total                                                                                         | 202,507            | -                       | 210,039            | -                       |

### 11 Shares held

#### Class A: Accumulation Retail

|                                     |                    |
|-------------------------------------|--------------------|
| <b>Opening shares at 01.01.2022</b> | <b>142,578,125</b> |
| Shares issued during the year       | 19,196,860         |
| Shares cancelled during the year    | (10,725,246)       |
| Shares converted during the year    | -                  |
| <b>Closing shares at 31.12.2022</b> | <b>151,049,739</b> |

#### Class B: Accumulation Staff

|                                     |                  |
|-------------------------------------|------------------|
| <b>Opening shares at 01.01.2022</b> | <b>5,582,948</b> |
| Shares issued during the year       | 877,953          |
| Shares cancelled during the year    | (407,517)        |
| Shares converted during the year    | -                |
| <b>Closing shares at 31.12.2022</b> | <b>6,053,384</b> |

### 12 Contingent assets and liabilities

At 31 December 2022, the Sub-fund had no contingent liabilities or commitments (31 December 2021: £nil).

### 13 Post balance sheet events

As indicated in the accounting policies in Note 1, the investments have been valued at the closing valuation point on 30 December 2022. Since that date, the Sub-fund's quoted price has moved as follows for each share class:

| Share class                  | Price at 30 December 2022 (GBP) | Price at 27 April 2023 (GBP) |
|------------------------------|---------------------------------|------------------------------|
| Class A: Accumulation Retail | 130.6136                        | 133.0451                     |
| Class B: Accumulation Staff  | 132.0497                        | 134.5105                     |



NOTES TO THE FINANCIAL STATEMENTS (Continued)

14 Direct transaction costs

|                                                | 2022               |                | 2021               |                |
|------------------------------------------------|--------------------|----------------|--------------------|----------------|
|                                                | £                  | %              | £                  | %              |
| <b>Analysis of total purchase costs</b>        |                    |                |                    |                |
| Purchases in the year before transaction costs | 187,642,438        |                | 125,691,300        |                |
| Commission                                     | 22,568             | 0.01%          | 18,731             | 0.01%          |
| Taxes and levies                               | 7,969              | 0.00%          | -                  | 0.00%          |
| Total purchase costs                           | <u>30,537</u>      | <u>0.01%</u>   | <u>18,731</u>      | <u>0.01%</u>   |
| Total purchases including transaction costs    | <u>187,672,975</u> |                | <u>125,710,031</u> |                |
| <b>Analysis of total sale costs</b>            |                    |                |                    |                |
| Sales in the year before transaction costs     | 168,869,712        |                | 97,769,125         |                |
| Commission                                     | (17,795)           | (0.01%)        | (9,968)            | (0.01%)        |
| Taxes and levies                               | (828)              | (0.00%)        | -                  | (0.00%)        |
| Total sale costs                               | <u>(18,623)</u>    | <u>(0.01%)</u> | <u>(9,968)</u>     | <u>(0.01%)</u> |
| Total sales net of transaction costs           | <u>168,851,089</u> |                | <u>97,759,157</u>  |                |

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

|            | 2022          | % of average    | 2021          | % of average    |
|------------|---------------|-----------------|---------------|-----------------|
|            | £             | net asset value | £             | net asset value |
| Commission | <u>40,363</u> | <u>0.02%</u>    | <u>28,699</u> | <u>0.01%</u>    |
|            | 40,363        | 0.02%           | 28,699        | 0.01%           |

15 Portfolio Dealing Spread

The average portfolio dealing spread at 31 December 2022 is 0.09% (2021: 0.10%)

16 Related Party transactions

Valu-Trac Investment Management Limited, as ACD is a related party due to its ability to act in respect of the operations of the Sub-fund.

Amounts paid to the ACD and its associates are disclosed in note 4. The amounts due to the ACD and its associates at the balance sheet date are disclosed in note 9.

## DISTRIBUTION TABLES

### Interim distribution in pence per share

Group 1: Shares purchased prior to 01 January 2022

Group 2 : Shares purchased on or after 01 January 2022 and on or before 30 June 2022

01 January 2022 to 30 June 2022

| <b>Class A: Accumulation<br/>Retail</b> | <b>Net revenue<br/>31.08.2022</b> | <b>Equalisation</b> | <b>Distribution<br/>31.08.2022</b> | <b>Distribution<br/>31.08.2021</b> |
|-----------------------------------------|-----------------------------------|---------------------|------------------------------------|------------------------------------|
| Group 1                                 | 1.1487p                           | -                   | 1.1487p                            | 0.8667p                            |
| Group 2                                 | 0.5356p                           | 0.6131p             | 1.1487p                            | 0.8667p                            |

  

| <b>Class B: Accumulation<br/>Staff</b> | <b>Net revenue<br/>31.08.2022</b> | <b>Equalisation</b> | <b>Distribution<br/>31.08.2022</b> | <b>Distribution<br/>31.08.2021</b> |
|----------------------------------------|-----------------------------------|---------------------|------------------------------------|------------------------------------|
| Group 1                                | 1.1600p                           | -                   | 1.1600p                            | 0.8719p                            |
| Group 2                                | 0.6320p                           | 0.5280p             | 1.1600p                            | 0.8719p                            |

### Final distribution in pence per share

Group 1: Shares purchased prior to 01 July 2022

Group 2 : Shares purchased on or after 01 July 2022 and on or before 31 December 2022

01 July 2022 to 31 December 2022

| <b>Class A: Accumulation<br/>Retail</b> | <b>Net Revenue<br/>28.02.2023</b> | <b>Equalisation</b> | <b>Distribution<br/>28.02.2023</b> | <b>Distribution<br/>28.02.2022</b> |
|-----------------------------------------|-----------------------------------|---------------------|------------------------------------|------------------------------------|
| Group 1                                 | 0.5378p                           | -                   | 0.5378p                            | 0.4415p                            |
| Group 2                                 | 0.0950p                           | 0.4428p             | 0.5378p                            | 0.4415p                            |

  

| <b>Class B: Accumulation<br/>Staff</b> | <b>Net Revenue<br/>28.02.2023</b> | <b>Equalisation</b> | <b>Distribution<br/>28.02.2023</b> | <b>Distribution<br/>28.02.2022</b> |
|----------------------------------------|-----------------------------------|---------------------|------------------------------------|------------------------------------|
| Group 1                                | 0.5348p                           | -                   | 0.5348p                            | 0.4457p                            |
| Group 2                                | 0.0801p                           | 0.4547p             | 0.5348p                            | 0.4457p                            |

### Information for corporate shareholders

A corporate shareholder receives the distribution shown on the voucher enclosed with this report as follows:

- i) 76.62% of the total dividend allocation together with the tax credit is received as franked investment income.
- ii) 23.38% of the dividend allocation is received as an annual payment received after deduction of income tax at the lower rate and is liable to corporation tax. It is not franked investment income.

## INFORMATION FOR INVESTORS

---

### Distribution

Distributions of the revenue of the Company if applicable will be made to shareholders on or before the last day of February each year and interim allocations of revenue on or before 31 August.

### Individual shareholders

**Income tax:** Tax-free annual dividend allowance now standing at £2,000 (2022/23). UK resident shareholders are subject to new, higher rates of tax on dividend income in excess of the annual allowance. The actual rate depends on the individual's tax rate band.

**Capital gains tax:** Individual shareholders resident in the UK for tax purposes may be liable to capital gains tax on realisation of their shares as with other chargeable assets. However, the first £12,300 (2022/23) of gains each year are presently tax free for individuals. Gains in excess of that amount are charged at the rate of tax applicable to the individual tax payer.

### Corporate shareholders

Companies resident for tax purposes in the UK, which hold shares should note that OEIC distributions are streamed into both franked and unfranked income. The unfranked income element will be treated as an annual payment which has been subject to income tax at prevailing rates and will be liable to tax accordingly. On realisation of their shares, UK resident companies may be liable to pay corporation tax on any capital gains.

The above information on taxation is only a general summary, and shareholders should consult their own tax advisors in relation to their own circumstances. Shareholders should also note that the position as outlined may change to reflect future changes in tax legislation.

### Issue and redemption of shares

Valu-Trac Investment Management Limited is the ACD and Registrar. Valu-Trac Investment Management Limited will receive requests for the purchase or sale of shares at any time during normal business hours between 8.30am and 5.30pm. Instructions may be given by email (grosvenor@valu-trac.com) or by sending an application form to the Registrar. Application forms are available from the Registrar.

The price of shares will be determined by reference to a valuation of the Company's net assets at 12 noon (London Time) on each dealing day.

The ACD has the right to reject, on reasonable grounds relating to the circumstances of the applicant, any application for shares in whole or part, and in this event the ACD will return any money sent, or the balance of such monies, at the risk of the applicant. In addition the ACD may reject any application previously accepted in circumstances where the applicant has paid by cheque and that cheque subsequently fails to be cleared.

Any subscription monies remaining after a whole number of shares has been issued will not be returned to the applicant. Instead, smaller denomination shares will be issued in such circumstances.

A contract note giving details of the shares purchased and the price used will be issued by the Registrar by the end of the business day following the valuation point by reference to which the purchase price is determined, together with, where appropriate, a notice of the applicant's right to cancel. Settlement is due four business days after the trade date shown on the contract note and should be made to the ACD's dealing account.

Ownership of shares will be evidenced by an entry on the Company's Register of Shareholders. Certificates will not be issued. Statements in respect of periodic distributions of revenue will show the number of shares held by the recipient in respect of which the distribution is made. Individual statements of a shareholder's shares will also be issued at any time on request by the registered holder.

Where shares are redeemed, payment will be made not later than the close of business on the fourth business day following the next valuation point after receipt by the ACD of a request for redemption. The minimum value of shares that a shareholder may hold is £1,000. The ACD may waive the minimum levels at its discretion.

The most recent issue and redemption prices are available from the ACD.

## INFORMATION FOR INVESTORS (continued)

### Remuneration

The ACD is subject to a remuneration policy which meets the requirements of the Undertakings for Collective Investment in Transferable Securities Directive (UCITS) as set out in SYSC 19E of the FCA Handbook.

The policy is designed to ensure practices for employee remuneration are consistent with, and promote, sound and effective risk management. It does not encourage risk-taking which is inconsistent with the risk profiles, rules or instrument of incorporation of the funds managed, and does not impair the ACD compliance with its duty to act in the best interests of the funds it manages.

The ACD has reviewed the Remuneration Policy and its application in the last year which has resulted in no material changes to the policy or irregularities to process.

The ACD is required to disclose the total remuneration it pays to its staff during the financial year, split into fixed and variable remuneration, with separate aggregate disclosure for staff whose actions may have a material impact to the risk profile of a fund or the ACD itself. This includes executives, senior risk and compliance staff and certain senior managers.

| 30.09.2022                                                                                                                      | Number of Beneficiaries | Fixed Remuneration | Variable Remuneration Paid | Total Remuneration Paid |
|---------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------|----------------------------|-------------------------|
| Total remuneration paid by the ACD during the year                                                                              | 95                      | £ 2,760,167        | £ nil                      | £ 2,760,167             |
| Remuneration paid to employees of the ACD who have a material impact on the risk profile of the UK UCITS                        | 8                       | £ 492,146          | £ nil                      | £ 492,146               |
| Senior Management                                                                                                               | 18                      | £ 1,042,368        | £ nil                      | £ 1,042,368             |
| Control Functions                                                                                                               | 13                      | £ 652,722          | £ nil                      | £ 652,722               |
| Employees receiving total remuneration that takes them into the same remuneration brackets as senior management and risk takers | 3                       | £ 149,085          | £ nil                      | £ 149,085               |

Further information is available in the ACD's Remuneration Policy document which can be obtained from <https://www.valu-trac.com/Pillar%203%202021-09.pdf>. A paper copy of the remuneration policy is available on request from the registered office of the Authorised Corporate Director free of charge.

**CORPORATE DIRECTORY**

|                                                     |                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Authorised Corporate Manager &amp; Registrar</b> | Valu-Trac Investment Management Limited<br>Orton<br>Fochabers<br>Moray<br>IV32 7QE<br><br>Telephone: 01343 880344<br>Fax: 01343 880267<br>Email: grosvenor@valu-trac.com<br><br>Authorised and regulated by the Financial Conduct Authority<br>Registered in England No 2428648 |
| <b>Director</b>                                     | Valu-Trac Investment Management Limited as ACD                                                                                                                                                                                                                                  |
| <b>Investment Manager</b>                           | Brompton Asset Management Limited<br>1 Knightsbridge Green<br>London<br>SW1X 7QA<br><br>Authorised and regulated by the Financial Conduct Authority                                                                                                                             |
| <b>Depositary</b>                                   | NatWest Trustee and Depositary Services Limited<br>House A<br>Floor 0, 175 Glasgow Road<br>Gogarburn<br>Edinburgh<br>EH12 1HQ<br><br>Authorised and regulated by the Financial Conduct Authority                                                                                |
| <b>Auditor</b>                                      | Johnston Carmichael LLP<br>Chartered Accountants<br>Commerce House<br>Elgin<br>IV30 1JE                                                                                                                                                                                         |

## Statement by the Authorised Fund Manager (AFM) to the shareholders of the VT Brompton Cautious Fund on the outcome of the AFM's assessment of the value provided to shareholders

For the year ended 31 December 2022

This assessment is to establish what the VT Brompton Cautious Fund (the Fund) has delivered to you in return for the price you have had to pay.

Our assessment has been conducted against the seven factors outlined by the FCA and the Fund has been rated via a 'traffic light' system, where green (G) indicates good value: amber (A) room for improvement, and red (R) poor value.

The dashboard below shows the overall summary of this assessment, **as at 31 December 2022:**

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Cautious Fund</b>    |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

The dashboard below shows the overall summary for the previous assessment i.e. carried out as at 31 December 2021:

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Cautious Fund</b>    |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

The AFM is the Authorised Corporate Director of the Fund (ACD), Valu-Trac Investment Management Limited (Valu-Trac). The Investment Manager is Brompton Asset Management Limited. The sponsor of the Fund is Brompton Asset Management Services Ltd.

The Fund was launched on 6 January 2017 with the Class A: Accumulation Retail and Class B: Accumulation Staff share classes. The B class shares are only available to staff of the sponsor.

The Fund changed its name from the VT Grosvenor Cautious Fund, to become the VT Brompton Cautious Fund, on 12 December 2022.

The Fund aims to generate a total return (i.e. through a combination of capital and/or income growth), by utilising a cautious approach to investing, over the longer term (at least 5 years).

The composition of the portfolio will reflect the Investment Manager's view of the potential future return of different asset classes and specific investments - for this Fund the Investment Manager aims to take a cautious approach, with a higher proportion of the Fund exposed to assets which it considers 'lower risk' (such fixed income) and less in those which may be 'higher risk' (such as certain equities).

The Fund will be actively managed and will typically invest at least 80% of its Net Asset Value in collective investment schemes (including exchange traded funds and investment trusts, and which may include schemes which are managed and/or advised by the AFM and/or Investment Manager).

The collective investment vehicles will provide exposure to fixed income (including but not limited to sovereign bonds, corporate bonds and convertible bonds) and other conservative alternative investments (including, but not limited to, UCITS Long Short funds, market neutral funds and structured products) as well as equities. The Fund's exposure to equities will not exceed 35% of the Net Asset Value of the Fund.

The Fund may also invest directly in other transferable securities (including equities), money market instruments, cash and near cash.

Investments will not be confined by geographical, industrial or economic sector.

Derivatives may be used only for Efficient Portfolio Management (including hedging) in accordance with the FCA Rules. Efficient portfolio management means using derivatives in a way that is designed to reduce risk or cost and/or generate extra income or growth. Use of derivatives is expected to be limited.

| <b>At and for the year ended</b>                  |                  |                  |                  |                  |                  |
|---------------------------------------------------|------------------|------------------|------------------|------------------|------------------|
|                                                   | <b>31-Dec-22</b> | <b>31-Dec-21</b> | <b>31-Dec-20</b> | <b>31-Dec-19</b> | <b>31-Dec-18</b> |
| <b>Value of Fund<br/>(per Performance Record)</b> |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | £164.8m          | £172.8m          | £134.4m          | £116.4m          | £95.0m           |
| Class B Accumulation: Staff                       | £3.2m            | £3.8m            | £2.4m            | £1.6m            | £1.3m            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Shares outstanding</b>                         |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 151.6m           | 146.1m           | 120.7m           | 106.9m           | 94.8m            |
| Class B Accumulation: Staff                       | 2.9m             | 3.2m             | 2.2m             | 1.5m             | 1.3m             |
|                                                   |                  |                  |                  |                  |                  |
| <b>NAV per share</b>                              |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 108.69p          | 118.23p          | 111.43p          | 108.92p          | 100.19p          |
| Class B Accumulation: Staff                       | 110.42p          | 119.83p          | 112.72p          | 109.95p          | 100.93p          |
|                                                   |                  |                  |                  |                  |                  |
| <b>Dividend per share</b>                         |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 1.79p            | 2.10p            | 1.88p            | 1.60p            | 2.17p            |
| Class B Accumulation: Staff                       | 1.81p            | 2.13p            | 1.90p            | 1.61p            | 2.18p            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Operating charges</b>                          |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 1.26%            | 1.29%            | 1.36%            | 1.19%            | 1.24%            |
| Class B Accumulation: Staff                       | 1.06%            | 1.09%            | 1.16%            | 0.99%            | 1.04%            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Net (losses) / gains before expenses</b>       |                  |                  |                  |                  |                  |
| Capital (losses) / gains                          | (£17.2m)         | £7.6m            | £1.9m            | £7.7m            | (£4.3m)          |
| Total Net (losses) / gains                        | (£12.8m)         | £10.7m           | £4.2m            | £9.6m            | (£2.7m)          |
|                                                   |                  |                  |                  |                  |                  |

Source: Valu-Trac Administration services

In carrying out the assessment of value the following criteria were considered:

### 1. Quality of service

The AFM considers that a good level of service was provided to shareholders by all parties involved commensurate to the amount paid by the Fund for those services. The AFM monitors the following operational services:

Depository – NatWest Trustee and Depository Services Limited

Custodian – RBC Investor Services Trust, UK branch (RBC)

The external audit is conducted by Johnston Carmichael LLP.

These services are essential in ensuring that the Fund operated efficiently and in the case of the Depository and Custodian the service is supervised on an on-going daily basis by the AFM. As a shareholder this means that you can be certain that your requests such as investment and redemption of the Fund’s units will always be carried out exactly as set out in the documentation.

Valu-Trac does not delegate any of the core functions of the Fund such as Fund administration, Fund accounting and transfer agency. This means that the AFM directly employs and supervises the individuals who are carrying out this work and that those undertaking the work are appropriately qualified and experienced. Due to this high level of supervision and control of these functions the AFM believes that the shareholders can be certain that their instructions will be carried out efficiently and that the reporting they receive is timely and focused. This also has ensured that the AFM has responded to any enquiries from shareholders fully and promptly.

The AFM has also assessed the costing of each of these services to comparable providers and has concluded that the company is receiving good value for the services provided by each party (detailed analysis on how we have arrived at this conclusion can be provided on request).

### 2. Performance

The AFM has assessed performance of the Fund net of all the charges that are outlined in its prospectus. The objective of the Fund is to generate growth in capital and income over the longer term. The Fund has a specific benchmark, IA Mixed Investment 0-35% and the performance of the Fund can be assessed by considering how the Fund has performed against the benchmark.

|                              | <b>2022 Performance</b> | <b>2022 Comparator Performance</b> | <b>5-Year Performance (p.a)</b> | <b>5-Year Comparator Performance (p.a)</b> |
|------------------------------|-------------------------|------------------------------------|---------------------------------|--------------------------------------------|
| Class A Accumulation: Retail | (8.07%)                 | (10.22%)                           | 0.93%                           | 0.13%                                      |
| Class B Accumulation: Staff  | (7.85%)                 | (10.22%)                           | 1.14%                           | 0.13%                                      |

Source - Morningstar

The AFM has also assessed the risk taken to achieve the above performance and is satisfied no excessive risk was taken to achieve performance (detailed analysis on how we have arrived at this conclusion can be provided on request).



### 3. AFM costs - general

The costs charged during the year ended 31 December 2022 were as follows:

|                                 | £                | %age of average Fund value |
|---------------------------------|------------------|----------------------------|
| Investment manager's fee        | 1,008,850        | 0.59%                      |
| ACD fee                         | 27,980           | 0.02%                      |
| Sponsor's fee                   | 57,171           | 0.03%                      |
| Depositary fee                  | 56,997           | 0.03%                      |
| Audit fee                       | 7,770            | 0.01%                      |
| FCA fee                         | 50               | 0.00%                      |
| Safe custody fee                | 14,058           | 0.01%                      |
| Transaction charges (custodian) | 2,262            | 0.00%                      |
| Other expenses                  | 10,738           | 0.01%                      |
| <b>Total Costs</b>              | <b>1,185,876</b> | <b>0.70%</b>               |

Total losses for the year (capital and revenue) less costs were £14.46m. Taxation was £0.43m.

The prospectus does allow for a dilution levy charge. The AFM's policy is that it may require a dilution levy on the purchase and redemption of shares if, in its opinion, the existing shareholders (for purchases) or remaining shareholders (for redemptions) might otherwise be adversely affected. For example, the dilution levy may be charged in the following circumstances: where the Scheme Property of a Fund is in continual decline; on a Fund experiencing large levels of net purchases relative to its size; on "large deals" (typically being a purchase or redemption of Shares to a size exceeding 3% of the Net Asset Value of the relevant Fund); in any case where the AFM is of the opinion that the interests of existing or remaining shareholders require the imposition of a dilution levy. There were no dilution levies charged in the period under review.

The AFM has considered the costs charged to the Fund by comparing the operating charges of the share classes to the average OCF of the largest 10 funds in the IA Mixed 0-35% sector, retail classes where available. This is shown below. This is shown below:

|                                                                               | Operating charges |
|-------------------------------------------------------------------------------|-------------------|
| Class A Accumulation: Retail                                                  | 1.23%             |
| Class B Accumulation: Staff                                                   | 1.03%             |
| IA Mixed Investment 0-35% Shares Sector Average (average of 10 largest funds) | 1.24%             |

Source - Morningstar

The AFM has concluded the costs, and in particular the Investment Manager's fee is appropriate and justified for the Fund. It should be noted that a significant portion of the operating charges is the costs of underlying funds it holds; at 0.53%. Excluding this, the operating charges would be 0.70% for the Class A share class and 0.50% for the Class B share class. Section 7 discusses the difference in the annual management fee charged to the two share classes.

#### 4. Economies of scale

The AFM has assessed to what extent it has been able to achieve any savings as a result of economies of scale. Where any such savings have been made this has in every case been passed on to the shareholders. An example of this is the depositary fees charged being on a sliding scale so reduce in cost as the Fund exceeds certain thresholds. As the AFM grows its total assets across all schemes it uses this purchasing power to benefit all schemes.

#### 5. Comparable market rates

The AFM has compared the charges of this Fund with that of comparable funds. The AFM selected funds that are classified in the IA Mixed 0-35% Sector along with similar style funds that the AFM administer. The AFM believes that the shareholders of the Fund are achieving efficient market rates as a whole and are not excessive as discussed in section 3. As the AFM assets grow in total it continues to strive for extra efficiencies wherever this can be achieved for all of its schemes.

#### 6. Comparable services

The services provided to this Fund and the costs are also comparable amongst other similar funds operated by the AFM, and is aligned with its normal operating model.

#### 7. Classes of units

The Annual Management Charge which pays the Investment Manager fee, the Sponsorship fee and the ACD fee is as follows: A Class 0.65%, B Class 0.45%. The Class B shares are only available to employees (as at the time of initial investment) of Brompton Asset Management Services Ltd or otherwise at the AFM's discretion.

### CONCLUSION

As mentioned in the introduction, we have rated the Fund based on a 'traffic light' assessment system. This is shown in the table below, where green (G) indicates good value; amber (A) indicates room for improvement, and red (R) indicates poor value.

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Cautious Fund</b>    |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

In taking all of these criteria into consideration the AFM concludes that in assessing whether the payments out of the scheme property as set out in the prospectus are justified in the context of the overall value delivered to shareholders, the AFM concludes that the shareholders of VT Brompton Cautious Fund are receiving good value.

04 April 2023

## Statement by the Authorised Fund Manager (AFM) to the shareholders of the VT Brompton Adventurous Fund on the outcome of the AFM's assessment of the value provided to shareholders

For the year ended 31 December 2022

This assessment is to establish what the VT Brompton Adventurous Fund (the Fund) has delivered to you in return for the price you have had to pay.

Our assessment has been conducted against the seven factors outlined by the FCA and the Fund has been rated via a 'traffic light' system, where green (G) indicates good value: amber (A) room for improvement, and red (R) poor value.

The dashboard below shows the overall summary of this assessment, **as at 31 December 2022:**

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Adventurous Fund</b> |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

The dashboard below shows the overall summary for the previous assessment i.e. carried out as at 31 December 2021:

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Adventurous Fund</b> |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

The AFM is the Authorised Corporate Director (ACD) of the Fund, Valu-Trac Investment Management Limited (Valu-Trac). The Investment Manager is Brompton Asset Management Limited. The Sponsor of the Fund is Brompton Asset Management Services Ltd.

The Fund was launched on 6 January 2017 with the Class A: Accumulation Retail and Class B: Accumulation Staff share classes. The B class shares are only available to staff of the sponsor.

The Fund changed its name from the VT Grosvenor Adventurous Fund, to become the VT Brompton Adventurous Fund, on 12 December 2022.

The Fund aims to generate capital growth (i.e. the increase in the value of the shares in the Fund) over the longer term (at least 5 years).

The composition of the portfolio will reflect the Investment Manager's view of the potential future return of different asset classes and specific investments - for this Fund the Investment Manager aims to take an adventurous approach, with a greater proportion of the Fund exposed to assets which it considers 'higher risk' (such as certain equities) and less on those which may be 'lower risk'.

The Fund will be actively managed and will typically invest at least 80% of its Net Asset Value in collective investment schemes (including exchange traded funds and investment trusts, and which may include schemes which are managed and/or advised by the AFM and/or Investment Manager).

The Fund will generally be exposed to equity markets. However, the Fund will also have exposure (directly or indirectly) to other asset classes such as fixed income and alternatives (including, but not limited to, UCITS Long Short funds, market neutral funds and structured products), although exposure to such assets will not exceed 35% of the Net Asset Value of the Fund except in exceptional circumstances (e.g. where the Investment Manager anticipates sharp falls in asset values due to severe market stress).

The Fund may also invest directly in transferable securities (including equities), money market instruments, cash and near cash.

Investments will not be confined by geographical, industrial or economic sector.

Derivatives may be used only for Efficient Portfolio Management (including hedging) in accordance with the FCA Rules. Efficient portfolio management means using derivatives in a way that is designed to reduce risk or cost and/or generate extra income or growth. Derivative use is expected to be limited.

| <b>At and for the year ended</b>                  |                  |                  |                  |                  |                  |
|---------------------------------------------------|------------------|------------------|------------------|------------------|------------------|
|                                                   | <b>31-Dec-22</b> | <b>31-Dec-21</b> | <b>31-Dec-20</b> | <b>31-Dec-19</b> | <b>31-Dec-18</b> |
| <b>Value of Fund<br/>(per Performance Record)</b> |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | £197.3m          | £211.0m          | £164.7m          | £135.5m          | £97.7m           |
| Class B Accumulation: Staff                       | £8.0m            | £8.3m            | £5.9m            | £4.6m            | £3.6m            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Shares outstanding</b>                         |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 151.0m           | 142.6m           | 123.7m           | 113.5m           | 97.0m            |
| Class B Accumulation: Staff                       | 6.1m             | 5.6m             | 4.4m             | 3.8m             | 3.6m             |
|                                                   |                  |                  |                  |                  |                  |
| <b>NAV per share</b>                              |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 130.61p          | 148.01p          | 133.21p          | 119.36p          | 100.71p          |
| Class B Accumulation: Staff                       | 132.05p          | 149.41p          | 134.25p          | 120.05p          | 101.09p          |
|                                                   |                  |                  |                  |                  |                  |
| <b>Dividend per share</b>                         |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 1.69p            | 1.31p            | 1.06p            | 1.15p            | 1.12p            |
| Class B Accumulation: Staff                       | 1.69p            | 1.32p            | 1.06p            | 1.15p            | 1.12p            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Operating charges</b>                          |                  |                  |                  |                  |                  |
| Class A Accumulation: Retail                      | 1.33%            | 1.35%            | 1.36%            | 1.27%            | 1.44%            |
| Class B Accumulation: Staff                       | 1.13%            | 1.15%            | 1.16%            | 1.07%            | 1.24%            |
|                                                   |                  |                  |                  |                  |                  |
| <b>Net (losses) / gains before expenses</b>       |                  |                  |                  |                  |                  |
| Capital (losses) / gains                          | (£28.0m)         | £19.7m           | £17.3m           | £19.5m           | (£9.1m)          |
| Total Net (losses) / gains                        | (£24.9m)         | £21.6m           | £19.0m           | £20.7m           | (£8.3m)          |
|                                                   |                  |                  |                  |                  |                  |

In carrying out the assessment of value the following criteria were considered:

### 1. Quality of service

The AFM considers that a good level of service was provided to shareholders by all parties involved commensurate to the amount paid by the Fund for those services. The AFM monitors the following operational services:

Depository – NatWest Trustee and Depository Services Limited

Custodian – RBC Investor Services Trust, UK branch (RBC)

The external audit is conducted by Johnston Carmichael LLP.

These services are essential in ensuring that the Fund operated efficiently and in the case of the Depository and Custodian the service is supervised on an on-going daily basis by the AFM. As a shareholder this means that you can be certain that your requests such as investment and redemption of the Fund’s units will always be carried out exactly as set out in the documentation.

Valu-Trac does not delegate any of the core functions of the Fund such as Fund administration, Fund accounting and transfer agency. This means that the AFM directly employs and supervises the individuals who are carrying out this work and that those undertaking the work are appropriately qualified and experienced. Due to this high level of supervision and control of these functions the AFM believes that the shareholders can be certain that their instructions will be carried out efficiently and that the reporting they receive is timely and focused. This also has ensured that the AFM has responded to any enquiries from shareholders fully and promptly.

The AFM has also assessed the costing of each of these services to comparable providers and has concluded that the company is receiving good value for the services provided by each party (detailed analysis on how we have arrived at this conclusion can be provided on request).

### 2. Performance

The AFM has assessed performance of the Fund net of all the charges that are outlined in its prospectus. The objective of the Fund is to generate capital growth. The Fund has a specific benchmark, IA Flexible and the performance of the Fund can be assessed by considering how the Fund has performed against the benchmark.

To show capital and income growth, the total returns generated are shown on the table below this is after operating costs, including the fee paid to the investment manager, and transaction costs which vary depending on the class of shares, this is discussed more in the Classes of Units section below.

|                              | <b>2022 Performance</b> | <b>2022 Comparator Performance</b> | <b>5-Year Performance (p.a)</b> | <b>5-Year Comparator Performance (p.a)</b> |
|------------------------------|-------------------------|------------------------------------|---------------------------------|--------------------------------------------|
| Class A Accumulation: Retail | (11.76%)                | (9.13%)                            | 3.55%                           | 3.18%                                      |
| Class B Accumulation: Staff  | (11.62%)                | (9.13%)                            | 3.74%                           | 3.18%                                      |

Source - Morningstar

The AFM has also assessed the risk the Fund took to achieve the above performance and has concluded that the Fund not taken excessive risk to achieve this performance (detailed analysis on how we have arrived at this conclusion can be provided on request).

### 3. AFM costs - general

The costs charged during the year ended 31 December 2022 were as follows:

|                                 | £                | %age of average Fund value |
|---------------------------------|------------------|----------------------------|
| Investment manager's fee        | 1,228,141        | 0.59%                      |
| ACD fee                         | 27,980           | 0.01%                      |
| Sponsor's fee                   | 76,462           | 0.04%                      |
| Depositary fee                  | 67,948           | 0.03%                      |
| Audit fee                       | 7,790            | 0.00%                      |
| FCA fee                         | 52               | 0.00%                      |
| Safe custody fee                | 20,001           | 0.01%                      |
| Transaction charges (custodian) | 1,351            | 0.00%                      |
| Other expenses                  | 10,607           | 0.01%                      |
| <b>Total Costs</b>              | <b>1,440,332</b> | <b>0.69%</b>               |

Total losses for the year (capital and revenue) less costs were £26.4m. There was no taxation.

The prospectus does allow for a dilution levy charge. The AFM's policy is that it may require a dilution levy on the purchase and redemption of shares if, in its opinion, the existing shareholders (for purchases) or remaining shareholders (for redemptions) might otherwise be adversely affected. For example, the dilution levy may be charged in the following circumstances: where the Scheme Property of a Fund is in continual decline; on a Fund experiencing large levels of net purchases relative to its size; on "large deals" (typically being a purchase or redemption of Shares to a size exceeding 3% of the Net Asset Value of the relevant Fund); in any case where the AFM is of the opinion that the interests of existing or remaining shareholders require the imposition of a dilution levy. There were no dilution levies charged in the period under review.

The AFM has considered the costs charged to the Fund by comparing the operating charges of the share classes to the average OCF of the largest 10 funds in the IA Flexible sector, retail classes where available. This is shown below:

|                                                                     | Operating charges |
|---------------------------------------------------------------------|-------------------|
| Class A Accumulation: Retail                                        | 1.33%             |
| Class B Accumulation: Staff                                         | 1.13%             |
| IA Flexible Investment Sector Average (average of 10 largest funds) | 1.23%             |

Source - Morningstar

The AFM has concluded that the investment management fees are appropriate and justified for the Fund. It should be noted that a significant portion of the operating charges is the costs of underlying funds it holds at 0.63%. Excluding this the operating charges would be 0.70% for the Class A share class and 0.50% for the Class B share class. Section 7 discusses the difference in the annual management fee charged to the two share classes.

#### 4. Economies of scale

The AFM has assessed to what extent it has been able to achieve any savings as a result of economies of scale. Where any such savings have been made this has in every case been passed on to the shareholders. An example of this is the depositary fees charged being on a sliding scale so reduce in cost as the Fund exceeds certain thresholds. As the AFM grows its total assets across all schemes it uses this purchasing power to benefit all schemes.

#### 5. Comparable market rates

The AFM has compared the charges of this Fund with that of comparable funds. The AFM selected funds that are classified in the IA Flexible sector along with similar style funds that the AFM administer. The AFM believes that the shareholders of the Fund are achieving efficient market rates as a whole and are not excessive as discussed in section 3. As the AFM assets grow in total it continues to strive for extra efficiencies wherever this can be achieved for all of its schemes.

#### 6. Comparable services

The services provided to this Fund and the costs are also comparable amongst other similar funds operated by the AFM, and is aligned with its normal operating model.

#### 7. Classes of units

The Annual Management Charge which pays the Investment Manager fee, the Sponsorship fee and the ACD fee is as follows: A Class 0.65%, B Class 0.45%. The Class B shares are only available to employees (as at the time of initial investment) of Brompton Asset Management Services Ltd or otherwise at the AFM's discretion.

### CONCLUSION

As mentioned in the introduction, we have rated the Fund based on a 'traffic light assessment system. This is shown in the table below, where green (G) indicates good value; amber (A) indicates room for improvement, and red (R) indicates poor value.

|                                     | Quality of Service | Performance | AFM costs - general | Economies of scale | Comparable market rates | Comparable services | Classes of units | Overall |
|-------------------------------------|--------------------|-------------|---------------------|--------------------|-------------------------|---------------------|------------------|---------|
| <b>VT Brompton Adventurous Fund</b> |                    |             |                     |                    |                         |                     |                  |         |
| <b>Class A Accumulation: Retail</b> | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |
| <b>Class B Accumulation: Staff</b>  | ● G                | ● G         | ● G                 | ● G                | ● G                     | ● G                 | ● G              | ● G     |

In taking all of these criteria into consideration the AFM concludes that in assessing whether the payments out of the scheme property as set out in the prospectus are justified in the context of the overall value delivered to shareholders, the AFM concludes that the shareholders of VT Brompton Adventurous Fund are receiving good value.

04 April 2023