

The VT De Lisle America Fund

**Annual Report and Financial Statements
for the year ended 31 March 2020**

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COMPANY OVERVIEW

Type of Company

The Mulben Investment Funds ("the Company") is an authorised open-ended investment company with variable capital ("ICVC") further to a Financial Conduct Authority ("FCA") authorisation order dated 19 May 2010. The Company is incorporated under registration number IC000816. It is a UCITS scheme complying with the investment and borrowing powers rules in the Collective Investment Schemes Sourcebook ("COLL") issued by the FCA.

The Company has been set up as an umbrella company. The Company has currently two sub-funds available for investment, The VT icf Absolute Return Portfolio and The VT De Lisle America Fund.

STATEMENT OF THE AUTHORISED CORPORATE DIRECTOR'S (ACD'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/(expenses) 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 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.

Anne A. Laing CA

Neil J. Smith MA BA CA

Valu-Trac Investment Management Limited
Authorised Corporate Director

Date

STATEMENT OF THE DEPOSITARY'S RESPONSIBILITIES AND REPORT OF THE DEPOSITARY

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 and 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 April 2020

INDEPENDENT AUDITOR'S REPORT TO THE SHAREHOLDERS OF THE MULBEN INVESTMENT FUNDS (SUB-FUNDS THE VT ICF ABSOLUTE RETURN PORTFOLIO AND THE VT DE LISLE AMERICA FUND)

Opinion

We have audited the financial statements of The Mulben Investment Funds ("the Company") for the year ended 31 March 2020 which comprise the Statement of Total Return, Statement of Changes in Net Assets Attributable to Shareholders, Balance Sheet, the related Notes to the Financial Statements including a summary of 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 March 2020 and of the net revenue/(expenses) 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

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- > the ACD's use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- > the ACD has not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the Company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

Other Information

The ACD is responsible for the other information. The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. 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.

In connection with our audit of the financial statements, 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 audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. 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 ACD and in the report of the authorised fund manager for the year is consistent with the financial statements.

INDEPENDENT AUDITOR'S REPORT TO THE SHAREHOLDERS OF THE MULBEN INVESTMENT FUNDS (SUB-FUNDS THE VT ICF ABSOLUTE RETURN PORTFOLIO AND THE VT DE LISLE AMERICA FUND) (Continued)

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 controls as the ACD 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 ACD 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 ACD 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.

As part of an audit in accordance with ISAs (UK), we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- > Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- > Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- > Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the ACD.
- > Conclude on the appropriateness of the ACD's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- > Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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

SUB-FUND OVERVIEW

Name of Sub-fund	The VT De Lisle America Fund
Size of Sub-fund	£23,661,669
Launch date	06 August 2010
Investment objective and policy	<p>The Sub-fund will aim to achieve a long term return.</p> <p>The Sub-fund will invest primarily in equities and other investments in America (and may also invest in Canada). The Sub-fund will invest in, predominantly, listed securities, typically common stock and American Depositary Receipts listed on US exchanges, including exchange traded funds. The Sub-funds may invest in collective schemes, transferable securities, cash deposits and money market funds, permitted by the FCA Rules. The Sub-fund will not use derivatives.</p>
Authorised Corporate Director (ACD)	Valu-Trac Investment Management Limited
Ex-distribution dates	31 March, 30 September
Distribution dates	31 May, 30 November
Individual Savings Account (ISA)	The Sub-fund is a qualifying investment for inclusion in an ISA.
Minimum investment	
Lump sum subscription:	All net accumulation share classes £1,000 (or \$1,000)
Top-up:	All net accumulation share classes £500 (or \$500)
Holding:	All net accumulation share classes £1,000 (or \$1,000)
Redemption:	All net accumulation share classes £500 (or \$500)
The ACD may waive the minimum levels at its discretion.	
ACD charges	
The annual management charge is comprised of a fixed element which is retained by the ACD for its own account and a variable element which is paid by the ACD to the investment manager.	
The fixed element, which is equal to £12,500 per annum, is taken from A Class and B Class shares pro-rata to their net asset value.	
The variable element in respect of the A Class shares (£) is equal to 1.50% per annum of the net asset value of the A Class shares (£). However this share class is currently unavailable.	
The variable element in respect of the B Class shares (£) is equal to 1.00% per annum of the net asset value of the B Class shares (£).	
The variable element in respect of the B Class shares (\$) is equal to 1.00% per annum of the net asset value of the B Class shares (\$).	
Initial charge	Class A Net Accumulation GBP = 5.0% Class B Net Accumulation GBP = 2.0% Class B Net Accumulation USD = 2.0%
The initial charge is currently waived.	

INVESTMENT MANAGER'S REVIEW

The VT De Lisle America Fund seeks to achieve capital appreciation by principally investing in US smaller companies. We have 93 holdings, of which just four stocks are large cap and total 10% of the Fund. This is to provide some small hedge which is put on when macro conditions clearly favour large growth stocks. The rest of the holdings are typically below \$1 billion in market cap and so the Index which we most might be closely compared with is the Russell Microcap Index. Our largest holding remains FS Bancorp, which ended the year at 8.5% of the Fund.

The Fund's objective is to increase the price of its units and it is not contained by any thematic type of investment. However, we will always likely be the smallest cap fund around and our self imposed hedges will not go far beyond their current levels. This hedging is an attempt to keep up with the large cap growth theme which has been the dominating market feature since the start of 2017.

Manager's Review

The share classes within the VT De Lisle America Fund fell by 24.00% for the US dollar class and fell by 19.05% for the sterling class. The sterling class fell less because over the period the pound fell from \$1.32 to \$1.24 and the Fund does not hedge its full US dollar exposure. The two share classes have the same value per share if measured in a single currency. In the period, the Fund fell from \$39 million to \$29 million due to market action.

As I review the previous year's report, little has changed. The report can be trotted out again. Here was the start: "In the year, we were in the worst place." The pandemic created a waterfall effect, getting things wobbly from the third week of February and then cascading into a March low on the 23rd, and effectively our year-end. The initial crash just imagined a sudden and deep recession and our stocks were ideally badly positioned for this effect and got crushed from a low base.

Our 24.00% loss only becomes bearable when we examine it in a wider context. To this effect, I am going to let the numbers of reasonable comparisons tell the story:

S&P400 (mid cap) down 23.9%

Russell 2000 (small cap) down 25.11%

S&P600 (small cap) down 27.27%

Russell Microcap (very small cap) down 27.73%

Community Bank Index (very small cap) down 29.43%

S&P600 Value Component (small cap) down 32.26%

Of all these, we are nearest the last two, being a value fund and being overweight community banks. We are least near the S&P400 because we have only two stocks in the 400 and they are generally much bigger companies. In the year our weighting in community banks reduced from 44.5% to 40.0% but we remain overweight.

If we now look where we are in the historic context, we go back beyond the 2000 top to 1904 which was the last time the P/E ratio of value stocks to growth stocks was this compressed and concomitantly the P/E ratio of small stocks to large stocks (Source: Two Centuries Investments).

Outlook

Our relative performance changes as MMT bites. Already, there is no politician anywhere who would dare push austerity and a 90 year Kondratieff pendulum is at an extreme. In 1980, inflation was to be beaten at all costs including unemployment. Today, unemployment is to be beaten at all costs even including inflation. The bite is marked first in the bond market. I think the top here is already in on March 9th.

INVESTMENT MANAGER'S REVIEW (Continued)

Our relative performance picks up when bonds start to fall meaningfully, although that may take a while. In the meantime, we are pushing hard our post-pandemic plays based on previous behaviour. We are invested in exuberance, the Great Outdoors, and will invest in biotech, expecting regulatory ease as needs must.

De Lisle Partners LLP

Investment Manager to the Fund

PERFORMANCE RECORD

Financial Highlights

Class B GBP Net Accumulation

	Year to 31 March 2020	Year to 31 March 2019	Year to 31 March 2018
Changes in net assets per unit	GBP	GBP	GBP
Opening net asset value per unit	339.3753	350.5309	354.8939
Return before operating charges	(60.6045)	(7.0217)	(0.1844)
Operating charges (note 1)	(4.0540)	(4.1339)	(4.1786)
Return after operating charges *	(64.6585)	(11.1556)	(4.3630)
Closing net asset value per unit	274.7168	339.3753	350.5309
Retained distributions on accumulation shares	2.9786p	2.1643p	0.4250p
*after direct transactions costs of:	0.5527	0.4829	0.4938
Performance			
Return after charges	(19.05%)	(3.18%)	(1.23%)
Other information			
Closing net asset value	£12,289,856	£14,801,445	£18,591,423
Closing number of units	4,473,646	4,361,379	5,303,790
Operating charges (note 2)	1.11%	1.12%	1.15%
Direct transaction costs	0.18%	0.14%	0.14%
Prices			
Highest unit price	394.93	419.40	388.82
Lowest unit price	265.03	309.34	338.41

Class B USD Net Accumulation

	Year to 31 March 2020	Year to 31 March 2019	Year to 31 March 2018
Changes in net assets per unit	USDc	USDc	USDc
Opening net asset value per unit	288.3823	319.6502	286.6746
Return before operating charges	(65.8631)	(27.7442)	36.5727
Operating charges (note 1)	(3.3457)	(3.5237)	(3.5971)
Return after operating charges *	(69.2088)	(31.2679)	32.9756
Closing net asset value per unit	219.1735	288.3823	319.6502
Retained distributions on accumulation shares	1.9468c	1.4167c	0.2782c
*after direct transactions costs of:	0.4568	0.4256	0.4244
Performance			
Return after charges	(24.00%)	(9.78%)	11.50%
Other information			
Closing net asset value	\$14,274,346	\$19,581,249	\$21,214,819
Closing number of units	6,512,805	6,790,030	6,636,887
Operating charges (note 2)	1.11%	1.12%	1.15%
Direct transaction costs	0.18%	0.14%	0.14%
Prices			
Highest unit price	332.80	350.10	339.26
Lowest unit price	197.73	253.50	279.64

PERFORMANCE RECORD (Continued)

1. The operating charges per unit 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.

Risk Profile

Based on past data, the Sub-fund is ranked a '6' 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 6 because funds of this type have experienced significant rises and falls in value in the past. Please note that even the lowest risk class can lose you money and that extreme market circumstances can mean you suffer severe losses in all cases.

PORTFOLIO STATEMENT

As at 31 March 2020

Holding	Security	Value (Note 1g) £	% of Total Net Assets %
Financials 45.32% (2019 – 52.53%)			
10,604	American National Bankshares Inc	194,875	0.82
2,456	BCB Bancorp	20,516	0.09
14,565	Bar Harbor Bankshares Common Stock	208,455	0.88
33,173	Caretrust	418,279	1.77
1,371	C B Financial Services Inc	21,313	0.09
15,685	Central Federal Corporation	125,757	0.53
6,200	Coresite Realty Corporation	572,613	2.42
5,000	Customers Bancorp Inc	41,484	0.18
12,666	Evans Bancorp	250,549	1.06
9,000	Fauquier Bankshares Inc	99,865	0.42
23,498	First Bancorp	424,706	1.79
9,339	First Business Financial Services	122,516	0.52
15,253	First Interstate Bancsystem	345,532	1.46
73,060	FS Bancorp	2,001,433	8.47
2,000	Hingham Institution for Savings	230,579	0.97
2,915	Home Bancorp	56,825	0.24
12,896	Landmark Bancorp	209,452	0.89
64,305	Medallion Financial	94,947	0.40
23,370	Mercantile Bank Corp	382,214	1.62
30,308	Mid Penn Bancorp	486,612	2.06
9,000	Mr. Cooper Group Inc.	52,390	0.22
830	Nicolet Bankshares Inc	37,229	0.16
1,500	Northrim Bancorp Inc	32,512	0.14
5,000	OFG Bancorp Common Stock	46,136	0.19
20,375	Oregon Bancorp Inc	396,449	1.68
24,291	People's Bancorp of North Carolina	417,912	1.77
54,156	Plumas Bancorp	800,935	3.38
2,200	Preferred Bank	58,737	0.25
3,000	Salisbury Bancorp	71,480	0.30
3,683	Select Bancorp	22,110	0.09
9,802	Southern First Bancshares	221,731	0.94
44,496	Southern National Bancorp of Virginia	350,094	1.48
25,000	Sterling Bancorp Inc	76,556	0.32
1,216	Stock Yards Bancorp Inc	27,994	0.12
1,500	SVB Financial Group	188,680	0.80
31,960	Timberland Bancorp	484,434	2.05
70,576	TowneBank	1,004,379	4.24
4,993	West Bancorporation	66,572	0.28
3,644	Westwood Holdings	53,907	0.23
		10,718,759	45.32
Communication 0.34% (2019 – 0.00%)			
1,000	The Walt Disney Company Common Stock	80,747	0.34
		80,747	0.34
Consumer Staples 0.25% (2019 – 2.08%)			
15,197	Rocky Mountain Chocolate Factory	59,262	0.25
		59,262	0.25
Materials 5.07% (2019 – 8.16%)			
39,043	Steel Partners	533,832	2.26
22,476	UFP Technologies	664,359	2.81
		1,198,191	5.07

PORTFOLIO STATEMENT (Continued)

Holding	Security	Value (Note 1g) £	% of Total Net Assets %
Consumer Discretionary 25.09% (2019 – 13.59%)			
1,010	Amazon Com Inc	1,604,787	6.78
8,000	Camping World Holdings, Inc Class A common Stock	38,090	0.16
129,283	Crown Crafts	504,677	2.13
5,449	LCI Industries	287,060	1.21
27,886	Johnson Outdoors Inc	1,349,042	5.70
10,500	Malibu Boats Inc	243,382	1.03
13,000	MarineMax	101,232	0.43
92,735	Marine Products	672,993	2.84
3,000	M/I Homes Inc	41,152	0.17
1,500	RH Common Stock	142,746	0.60
53,146	Shiloh Industries	54,177	0.23
10,291	Strattec Security Corp	129,718	0.55
28,636	Superior Group of Companies	206,658	0.87
5,400	Thor Industries	183,536	0.78
12,000	Winnebago Industries	288,685	1.22
6,500	Zumiez Inc	91,477	0.39
		5,939,412	25
Industrials 13.10% (2019 – 15.28%)			
1,500	Acuity Brands Inc Common Stock	104,034	0.44
1,019	Alamo Group	73,617	0.31
6,800	BG Staffing Inc	47,286	0.20
12,156	Blue Bird Corporation	106,363	0.45
22,000	Builders FirstSource	228,451	0.97
11,700	DXP Enterprises, Inc	113,922	0.48
3,000	EMCOR Group	143,335	0.61
4,000	Encore Wire Corporation	134,998	0.57
2,110	Espey Manufacturing and Electronics Corp	30,480	0.13
3,200	Extra Space Storage Inc	250,391	1.06
58,696	Gencor Industries Inc	478,916	2.02
31,660	Jewett-Cameron Trading Ltd	144,722	0.61
18,341	L.B. Foster Company	170,794	0.72
98,450	Manitex International	303,868	1.28
2,000	Morningstar	189,657	0.80
15,000	NN Inc Common	22,148	0.09
29,203	Orion Marine Group	54,223	0.23
10,205	Patrick Industries	230,104	0.97
6,431	Vectrus	216,626	0.92
32,611	Virco Manufacturing Corporation	56,330	0.24
		3,100,265	13.10
Information Technology 5.68% (2019 – 5.30%)			
200	Alphabet Inc	185,460	0.78
83,331	Computer Task Group Inc	270,012	1.14
1,000	Fidelity National Information Services Inc	101,345	0.43
3,500	Microsoft Corporation	453,945	1.92
14,856	Steel Connect Inc	10,047	0.04
29,331	Wayside Technology Group Inc	323,680	1.37
		1,344,489	5.68
Energy 0.68% (2019 – 0.00%)			
20,000	Cameco Corporation Common Shares	119,496	0.51
5,000	MPLX LP Common units representing limited partner	40,675	0.17
		160,171	0.68
Health 6.13% (2019 – 3.33%)			
1,000	illumina	224,009	0.95
5,000	LHC Group	540,647	2.28
13,565	Kewaunee Scientific Corporation	83,408	0.35
6,000	National Research Corporation	214,050	0.90
9,600	The Ensign Group	297,976	1.26
7,454	Pennant Group INC	93,204	0.39
		1,453,294	6.13

PORTFOLIO STATEMENT (Continued)

Holding	Security	Value (Note 1g) £	% of Total Net Assets %
	Investment assets (2019 – 100.27%)	24,054,590	101.66
	Net other assets (2019 – 0.04%)	(216,098)	(0.91)
	Adjustment to revalue assets from mid to bid prices (2019 – (0.31%))	(176,823)	(0.75)
	Net assets	<u>23,661,669</u>	<u>100.00</u>

SUMMARY OF MATERIAL PORTFOLIO CHANGES

	£
Total sales for the year (note 14)	17,590,893
Adobe Systems Inc	263,929
Alamo Group	282,876
Allied Motion Technologies Inc	34,439
Altra Industrial Motion Corp	72,281
Ameris Bancorp	32,252
ASML Holding NV	176,921
ASV Holdings	171,602
Atlantic Capital Bancshares Inc	107,788
Atlassian Corporation PLC	102,228
Bank of South Carolina	651,335
Bar Harbor Bankshares	241,642
BCB Bancorp Inc	215,224
Blue Bird Corporation	45,010
Builders FirstSource Inc	255,694
Calavo Growers Inc	703,546
Central Pacific Financial Corp	34,375
Cleaveland-Cliffs Inc	207,897
Columbia Banking System Inc	81,894
Compass Minerals International Inc	357,296
DXP Enterprises Inc	137,550
Ensign Group Inc	34,642
Fauquier Bankshares Inc	32,771
Fidelity National Information Services Inc	1,504,581
First Business Financial Services Inc	79,270
First Interstate BancSystem Inc	176,502
First Merchants Corp	314,594
First United Corp	92,177
Fortive Corp	288,177
FS Bancorp Inc	285,453
Gencor Industries Inc	48,008
German American Bancorp Inc	408,172
Grand Canyon Education Inc	450,262
HEICO Corp	107,789
Hingham Institution For Savings	96,190
Home Bancorp Inc	151,610
Illumina Inc	119,654
Jewett-Cameron Trading Company Ltd	284,567
Johnson Outdoors Inc	47,221
Landmark Bancorp Inc	220,365
LCI Industries	82,705
Manitex International Inc	38,400
Marine Products Corp	24,852
MarineMax Inc	203,992
Mastercard Inc	506,296
McDonald's Corp	249,400
Medallion Financial Corp	100,619
Mercantile Bank Corp	27,319
Microsoft Corp	332,680
Morningstar Inc	287,528
MVC Capital Inc	42,122
National Research Corp	200,341
Northrim BanCorp Inc	77,151
Orion Group Holdings Inc	56,433
Packaging Corp of America	314,759
Patrick Industries Inc	302,020
PayPal Holdings Inc	392,632
Peoples Bancorp of North Carolina Inc	250,633
Pinnacle Financial Partners Inc	144,595
Preferred Bank	90,066
Primoris Services Corp	205,493
PSB Holdings Inc	51,249
Rayonier Advanced Materials Inc	37,315

SUMMARY OF MATERIAL PORTFOLIO CHANGES (Continued)

Select Bancorp Inc	42,617
Shiloh Industries Inc	55,081
Southern National Bancorp of Virginia Inc	328,035
Steel Connect Inc	9,952
Steel Partners Holdings LP	723,815
Stock Yards Bancorp Inc	30,652
Strattec Security Corp	21,298
Summer Infant Inc	4,973
SVB Financial Group	38,215
Towne Bank	535,657
Union Bankshares Corp	266,157
Vectrus Inc	889,514
Virco Mfg. Corp	702
Visa Inc	213,632
Walt Disney Co	853,903
Wayside Technology Group Inc	21,945
West Bancorporation Inc	153,986
Westwood Holdings Group Inc	464,375

Total purchases for the year (note 14) £
17,671,141

Acuity Brands Inc	161,136
Adobe Systems Inc	180,060
Alamo Group Inc	45,796
Allied Motion Technologies Inc	30,509
Alphabet Inc	216,754
Amazon.com Inc	1,609,813
American National Bankshares Inc	96,669
ASV Holdings Inc	129,034
Atlantic Capital Bancshares Inc	100,704
Atlassian Corporation PLC	113,778
Bank of South Carolina	66,750
Bar Harbor Bankshares	20,498
BG Staffing Inc	43,899
Blue Bird Corp	27,808
Builders FirstSource Inc	355,991
Calavo Growers Inc	117,107
Cameco Corp	168,213
Camping World Holdings Inc	82,747
CareTrust REIT Inc	35,328
CB Financial Services Inc	28,246
Central Federal Corp	167,933
Central Pacific Financial Corp	33,579
Cleaveland-Cliffs Inc	157,412
Columbia Banking System Inc	120,098
Computer Task Group Inc	22,458
Crown Crafts Inc	198,399
Customers Bancorp Inc	88,505
DXP Enterprises Inc	371,578
EMCOR Group Inc	210,048
Encore Wire Corp	182,683
Ensign Group Inc	439,194
Evans Bancorp Inc	289,458
Extra Space Storage Inc	296,961
Fauquier Bankshares Inc	171,115
Fidelity National Information Services Inc	928,002
First Bancorp	147,406
First Business Financial Services Inc	250,410
First Interstate BancSystem Inc	97,617
FS Bancorp Inc	193,096
Gencor Industries Inc	137,171
German American Bancorp Inc	23,479
Grand Canyon Education Inc	590,108

SUMMARY OF MATERIAL PORTFOLIO CHANGES (Continued)

HEICO Corp	88,480
Hingham Institution For Savings	358,305
Home Bancorp Inc	43,756
Illumina Inc	118,038
Johnson Outdoors Inc	281,460
Kewaunee Scientific Corp	30,957
L.B. Foster Co	66,219
Landmark Bancorp Inc	200,711
LCI Industries	204,805
M/I Homes Inc	98,322
Malibu Boats Inc	277,383
Manitex International Inc	14,036
Marine Products Corp	269,804
MarineMax Inc	271,566
Mastercard Inc	467,491
McDonald's Corp	246,328
Medallion Financial Corp	90,789
Microsoft Corp	750,025
Morningstar Inc	224,305
MPLX LP	91,909
Mr. Cooper Group Inc	88,980
MVC Capital Inc	42,710
National Research Corp	192,854
Nicolet Bankshares Inc	43,741
Northrim BanCorp Inc	115,407
OFG Bancorp	90,954
Oregon Bancorp Inc	89,027
Packaging Corp of America	149,441
Patrick Industries Inc	325,557
PayPal Holdings Inc	223,822
Pennant Group Inc	36,354
Peoples Bancorp of North Carolina Inc	267,461
Plumas Bancorp	292,652
Rayonier Advanced Materials Inc	25,945
RH	237,846
Rocky Mountain Chocolate Factory Inc	114,764
Salisbury Bancorp Inc	89,976
Shiloh Industries Inc	42,009
Sterling Bancorp Inc	38,203
Stock Yards Bancorp Inc	65,912
Strattec Security Corp	61,690
SVB Financial Group	37,980
Thor Industries Inc	70,795
Timberland Bancorp Inc	516,687
UFP Technologies Inc	43,498
Vectrus Inc	88,066
Visa Inc	66,677
Walt Disney Co	950,361
Wayside Technology Group Inc	101,405
West Bancorporation Inc	50,868
Zumiez Inc	167,260

The above transactions represent all the sales and purchases during the year.

STATEMENT OF TOTAL RETURN

		Notes	31.03.20		31.03.19	
			£	£	£	£
Income						
	Net capital (losses)	2		(5,864,388)	(1,220,922)	
	Revenue	3	734,727	698,377		
Expenses		4	(360,804)	(390,572)		
Interest payable and similar charges		6	<u>-</u>	<u>-</u>		
Net revenue before taxation			373,923	307,805		
Taxation		5	<u>(113,983)</u>	<u>(109,983)</u>		
Net revenue after taxation			<u>259,940</u>	<u>197,822</u>		
Total return before distributions			(5,604,448)	(1,023,100)		
Finance costs: distributions		6	<u>(259,940)</u>	<u>(197,822)</u>		
Changes in net assets attributable to shareholders from investment activities			<u>(5,864,388)</u>	<u>(1,220,922)</u>		

STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO SHAREHOLDERS

	31.03.20	31.03.19
	£	£
Opening net assets attributable to shareholders	29,649,146	33,601,278
Amounts receivable on creation of shares	6,519,606	4,018,699
Amounts payable on cancellation of shares	(6,917,986)	(6,953,952)
Distribution accumulated	264,150	195,603
Dilution levy	11,141	8,440
Changes in net assets attributable to shareholders from investment activities (see above)	<u>(5,864,388)</u>	<u>(1,220,922)</u>
Closing net assets attributable to shareholders	<u>23,661,669</u>	<u>29,649,146</u>

BALANCE SHEET

As at 31 March 2020	Notes	31.03.20		31.03.19	
		£	£	£	£
Fixed Assets					
Investment assets			23,877,767		29,635,870
Current Assets					
Debtors	7	275,585		50,337	
Cash and bank balances	8	<u>1,908,695</u>		<u>299,663</u>	
Total current assets			<u>2,184,280</u>		<u>350,000</u>
Total assets			26,062,047		29,985,870
Current Liabilities					
Creditors	9	(2,400,378)		(311,721)	
Bank overdrafts		<u>-</u>		<u>(25,003)</u>	
Total current liabilities			<u>(2,400,378)</u>		<u>(336,724)</u>
Net assets attributable to shareholders			<u>23,661,669</u>		<u>29,649,146</u>

NOTES TO THE FINANCIAL STATEMENTS

For the year ended 31 March 2020

1 Accounting policies

(a) Basis of accounting

The financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for Authorised Funds (SORP) issued by the Investment Association (IA) in May 2014. The functional currency of the Fund is Sterling.

(b) Recognition of revenue

Revenue is included in the statement of total return on the following basis:

Dividends on quoted equities and preference shares are recognised when the shares are quoted ex-dividend.

Interest on bank and other cash deposits is recognised on an accruals basis.

All revenue includes withholding taxes but excludes irrecoverable tax credits.

(c) Treatment of stock and special dividends

The ordinary element of stocks received in lieu of cash dividends is credited to capital in the first instance followed by a transfer to revenue of the cash equivalent being offered and this forms part of the distribution revenue.

Special dividends are reviewed on a case by case basis in determining whether the dividend is to be treated as revenue or capital. Amounts recognised as revenue will form part of the distributable revenue. The tax accounting treatment follows the treatment of the principal amount.

(d) Treatment of expenses

All expenses, except for those relating to the purchase and sale of investments, are charged against revenue for the year on an accruals basis.

(e) Taxation

Corporation tax is provided at 20% on revenue, after deduction of expenses.

Where overseas tax has been deducted from overseas income that tax can, in some instances, be set off against the corporation tax payable, by way of double tax relief.

Deferred tax is provided using the liability method on all timing differences arising on the treatment of certain items for taxation purposes, calculated at the rate at which it is anticipated the timing difference will reverse. Deferred tax assets are recognised only when, on the basis of available evidence, it is more likely than not there will be taxable profits in the future against which the deferred tax asset can be offset.

(f) Distribution policy

The net revenue after taxation, as disclosed, in the financial statements, after adjustments for items of a capital nature, is distributable to shareholders as dividend distributions. Any revenue deficit is funded from capital.

The balance of revenue is distributed to investors via an interim and final distribution in accordance with the regulations.

Distributions not claimed within a six year period will be forfeited and added back to the capital property of the Sub-fund.

(g) Basis of valuation of investments

Listed investments are valued at close of business bid prices, excluding any accrued interest in the case of fixed interest securities.

(h) Exchange rates

Transactions in foreign currencies are recorded in Sterling at the rate ruling at the date of the transaction. Assets and liabilities expressed in foreign currencies at the end of the accounting period are translated into Sterling at the closing exchange rate ruling on that date.

(i) Dilution levy

The ACD may require a dilution levy on the sale and redemption of shares if, in its opinion, the existing shareholders (for redemption) might otherwise be adversely affected. In particular, the dilution levy may be charged in the following circumstances; where the scheme property is in continual decline; on a Sub-fund experiencing large levels of net sales relative to its size; on 'large deals'; in any case where the ACD is of its opinion that the interests of remaining shareholders require the imposition of a dilution levy.

(j) Equalisation

Equalisation will be applied to the Sub-fund. An allocation of income to be made in respect of each share issued or sold by the ACD during an accounting period in respect of which that income allocation is made may include a capital sum ("income equalisation") representing the ACD's best estimate of the amount of income included in the price of that share.

The amount of income equalisation in respect of any shares may be the actual amount of income included in the issue price of the shares in question or it may be an amount arrived at by taking the aggregate of the ACD's best estimate of the amounts of income included in the price of shares in that class issued or sold in the annual or interim period in question and dividing that aggregate by the number of those shares and applying the resultant average to each of the shares in question.

NOTES TO THE FINANCIAL STATEMENTS (Continued)

2 Net capital (losses)

	31.03.20	31.03.19
	£	£
The net capital (losses) comprise:		
Non-derivative securities (losses)	(5,817,219)	(1,239,189)
Transaction charges	(4,973)	(4,335)
Currency (losses)/gains	(42,196)	22,602
Total net capital (losses)	<u>(5,864,388)</u>	<u>(1,220,922)</u>

3 Revenue

	31.03.20	31.03.19
	£	£
Overseas dividends	730,762	693,843
Income tax refund	-	2,360
Bank interest	3,965	2,174
Total revenue	<u>734,727</u>	<u>698,377</u>

4 Expenses

	31.03.20	31.03.19
	£	£

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

ACD fee	12,594	12,500
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Payable to the Investment Manager, associates of the Investment Manager, and agents of either of them:

Investment manager's fee	<u>319,719</u>	<u>342,369</u>
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Payable to the Depositary, associates of the Depositary, and agents of either of them:

Depositary fee	18,136	18,022
Safe custody and transaction fees	2,966	10,156
	<u>21,102</u>	<u>28,178</u>

Other expenses:

Audit fee	6,938	6,900
FCA fee	36	249
Investment Association fee	235	(74)
Legal fees	180	450
	<u>7,389</u>	<u>7,525</u>

Total expenses	<u><u>360,804</u></u>	<u><u>390,572</u></u>
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NOTES TO THE FINANCIAL STATEMENTS (Continued)

5 Taxation

	31.03.20	31.03.19
	£	£

(a) Analysis of charge in the year

Irrecoverable income tax	113,983	109,983
Total tax charge for the year (note 5b)	<u>113,983</u>	<u>109,983</u>

(b) Factors affecting current tax charge for the year

The tax assessed for the year is higher than the standard rate of corporation tax in the UK for an open-ended investment company 20.00% (2019:20.00%). The differences are explained below:

Net revenue before UK corporation tax	373,923	307,805
Corporation tax at 20.00% (2019:20.00%)	74,785	61,561
Effects of:		
Revenue not subject to UK Corporation tax	(146,152)	(138,769)
Current year expenses not utilised	71,368	77,208
Overseas tax expenses	113,983	109,983
Total tax charge for year (note 5a)	<u>113,983</u>	<u>109,983</u>

(c) Provision for deferred taxation

At 31 March 2020 there is a potential deferred tax asset of £503,447 (31 March 2019: £432,079) 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

	31.03.20	31.03.19
	£	£

Interim dividend distribution	97,225	56,051
Final dividend distribution	164,123	139,552
	<u>261,348</u>	<u>195,603</u>

Add: Revenue deducted on cancellation of shares	16,216	3,339
Deduct: Revenue received on issue of shares	(17,624)	(1,120)

Net distribution for the year	259,940	197,822
Interest payable and similar charges	-	-
Total finance costs	<u>259,940</u>	<u>197,822</u>

Reconciliation of distributions

Net revenue after taxation	259,940	197,822
Net distribution for the year	<u>259,940</u>	<u>197,822</u>

NOTES TO THE FINANCIAL STATEMENTS (Continued)

7 Debtors	31.03.20	31.03.19
	£	£
Overseas dividends	41,221	45,166
Outstanding trade settlements	202,263	-
Income tax recoverable	20,746	5,141
Outstanding subscriptions	11,355	30
Total debtors	275,585	50,337

8 Cash and bank balances	31.03.20	31.03.19
	£	£
Cash and bank balances	1,908,695	299,663
Bank overdrafts	-	(25,003)

9 Creditors	31.03.20	31.03.19
	£	£

Amounts payable to the ACD, associates of the ACD and agents of either of them:

ACD's periodic charge	1,093	993
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Amounts payable to the Investment Manager, associates of the Investment Manager, and agents of either of them

Investment manager's fee	20,861	23,650
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Amounts payable to the Depositary, associates of the Depositary and agents of either of them:

Depositary's fees	1,574	1,430
Safe custody and other bank charges	5,300	7,626
	6,874	9,056

Other expenses:

Audit fee	6,900	6,862
FCA fee	7	138
	6,907	7,000

Outstanding redemptions	877,526	27,624
Outstanding trade settlements	1,487,117	243,398

Total creditors	2,400,378	311,721
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10 Units Held

Units Held - Class B Net Accumulation GBP

Opening units at 01.04.19	4,361,379
Units issued during the year	1,827,259
Units cancelled during the year	(1,714,992)
Units converted during the year	
Closing units as at 31.03.20	4,473,646

Units Held - Class B Net Accumulation USD

Opening units at 01.04.19	6,790,030
Units issued during the year	22,200
Units cancelled during the year	(299,425)
Units converted during the year	
Closing units as at 31.03.20	6,512,805

11 Financial instruments

In pursuing its investment objective as stated on page 21, 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)

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 Company 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 31.03.20 would have increased/decreased by £2,387,777 (2019: £2,963,587).

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 invested in overseas equities, and the balance sheet can be affected by movements in foreign exchange rates. Revenue received in other currencies is converted to Sterling on or near the date of receipt.

A portion of the net assets of the Sub-fund is denominated in currencies other than sterling with the effect that the balance sheet and total return can be affected by currency movements. If foreign exchange rates 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 31.03.20 would have increased/decreased by £2,478,756 (2019: £2,968,147).

Net currency monetary assets and liabilities consist of:

	Net monetary assets and liabilities		Non-monetary assets		Total net assets	
	£		£		£	
	31.03.20	31.03.19	31.03.20	31.03.19	31.03.20	31.03.19
Sterling	(1,125,893)	(59,953)	-	-	(1,125,893)	(59,953)
US Dollar	909,795	73,229	23,877,767	29,635,870	24,787,562	29,709,099
Total	(216,098)	13,276	23,877,767	29,635,870	23,661,669	29,649,146

Interest rate risk

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

31.03.20			
Currency	Floating rate financial assets	Financial assets not carrying interest	Total
	£	£	£
Sterling	998,899	-	998,899
US Dollar	909,796	24,153,352	25,063,148
Total	1,908,695	24,153,352	26,062,047
Currency	Floating rate financial liabilities	Financial liabilities not carrying interest	Total
	£	£	£
Sterling	-	(913,261)	(913,261)
US Dollar	-	(1,487,117)	(1,487,117)
Total	-	(2,400,378)	(2,400,378)

NOTES TO THE FINANCIAL STATEMENTS (Continued)

11 Financial instruments (Continued)

31.03.19			
Currency	Floating rate financial assets	Financial assets not carrying interest	Total
	£	£	£
Sterling	33,373	-	33,373
US Dollar	266,290	29,686,207	29,952,497
Total	299,663	29,686,207	29,985,870
	Floating rate financial liabilities	Financial liabilities not carrying interest	Total
	£	£	£
Sterling	(25,003)	(68,323)	(93,326)
US Dollar	-	(243,398)	(243,398)
Total	(25,003)	(311,721)	(336,724)

Interest rate risk is the risk that the value of the Sub-fund's investment holdings will fluctuate as a result of changes in interest rates.

Maturity of financial liabilities

The financial liabilities of the Sub-fund as at 31 March 2020 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 that the Company 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 Company has fulfilled its responsibilities. The Company 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 brokers' financial ratings are reviewed. Credit risk also arises on cash held within financial institutions and debt securities. Credit risk on cash balances is mitigated by ensuring that cash is held with financial institutions that are at least investment grade credit related. On debt securities credit risk is mitigated by ensuring that credit ratings are monitored regularly and in line with the investment objective and profile of the Sub-fund.

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:

- A Fair value based on a quoted price for an identical instrument in an active market.
- B Fair value based on the price of a recent transaction for an identical instrument.
- C1 Fair value based on a valuation technique using observable market data.
- C2 Fair value based on a valuation technique that relies significantly on non-observable market data.

Valuation Technique	Assets (£000's)	Liabilities (£000's)
A Quoted prices for identical instruments in active markets	23,878	
Total	23,878	-

12 Contingent assets and liabilities

At 31 March 2020, the Sub-fund had no contingent liabilities or commitments (31 March 2019: £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 31 March 2020. Since that date, the Sub-fund's quoted price has moved as follows for each share class:

Share Class	Price at 31 March 2020	Price at 17 July 2020
Class B Net Accumulation GBP	274.7168p	357.9045p
Class B Net Accumulation USD	219.1735c	290.7954c

NOTES TO THE FINANCIAL STATEMENTS (Continued)

14 Portfolio transaction costs

	31.03.20	% of total	31.03.19	% of total
	£	purchases	£	purchases
Analysis of total purchase costs				
Purchases in the year before transaction costs	17,646,468		11,731,643	
Commissions	24,673	0.14%	16,348	0.14%
Taxes & levies	-	0.00%	-	0.00%
Total purchase costs	<u>24,673</u>	<u>0.14%</u>	<u>16,348</u>	<u>0.14%</u>
Total purchases including transaction costs	<u>17,671,141</u>		<u>11,747,991</u>	

	£	% of total sales	£	% of total sales
Analysis of total sale costs				
Sales in the year before transaction costs	17,616,554		14,364,089	
Commissions	(25,316)	0.14%	(19,710)	0.14%
Taxes & levies	(345)	0.00%	(189)	0.00%
Total sale costs	<u>(25,661)</u>	<u>0.14%</u>	<u>(19,899)</u>	<u>0.14%</u>
Total sales net of transaction costs	<u>17,590,893</u>		<u>14,344,190</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:

	2020	% of average net	2019	% of average net
	£	asset value	£	asset value
Commissions	49,989	0.16%	36,058	0.12%
Taxes & levies	345	0.00%	189	0.00%
	<u>50,334</u>	<u>0.16%</u>	<u>36,247</u>	<u>0.12%</u>

DISTRIBUTION TABLES

Final distribution in pence per share

Group 1: Shares purchased prior to 01 October 2019

Group 2 : Shares purchased on or after 01 October 2019 and on or before 31 March 2020

01 October 2019 to 31 March 2020

Class B Net Accumulation GBP	Distribution accumulated 29.05.20	Equalisation	Distribution accumulated 29.05.2020	Distribution accumulated 31.05.2019
Group 1	1.8807p	-	1.8807p	1.5846p
Group 2	0.2345p	1.6462p	1.8807p	1.5846p

Class B Net Accumulation USD	Distribution accumulated 29.05.20	Equalisation	Distribution accumulated 29.05.2020	Distribution accumulated 31.05.2019
Group 1	1.2282c	-	1.2282c	1.0374c
Group 2	0.9375c	0.2907c	1.2282c	1.0374c

Interim distribution in pence per share

Group 1: Shares purchased prior to 01 April 2019

Group 2 : Shares purchased on or after 01 April 2019 and on or before 30 September 2019

01 April 2019 to 30 September 2019

Class B Net Accumulation GBP	Distribution accumulated 29.11.2019	Equalisation	Distribution accumulated 29.11.2019	Distribution accumulated 30.11.2018
Group 1	1.0979p	-	1.0979p	0.5797p
Group 2	0.6088p	0.4891p	1.0979p	0.5797p

Class B Net Accumulation USD	Distribution accumulated 29.11.2019	Equalisation	Distribution accumulated 29.11.2019	Distribution accumulated 30.11.2018
Group 1	0.7186c	-	0.7186c	0.3793c
Group 2	0.7186c	-	0.7186c	0.3793c

EQUALISATION

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.

Information for corporate shareholders

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

- i) 99.46% of the total dividend allocation together with the tax credit is received as franked investment income.
- ii) 0.54% 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

Authorised Status

The Mulben Investment Funds is incorporated in England and Wales as an ICVC under registration number IC000816. The shareholders are not liable for the debts of the Company.

The Company is authorised by the FCA as a UCITS Scheme under the COLL Sourcebook and is an umbrella company for the purposes of the OEIC Regulations. Each Fund would be a UCITS Scheme if it had a separate authorisation order. The effective date of the authorisation order made by the FSA (predecessor of the FCA) was 19 May 2010.

Head Office

Valu-Trac investment Management Limited, Level 13, Broadgate Tower, 20 Primrose Street, London, EC2A 2EW.

Base Currency

The base currency of the Company is Pounds Sterling.

Share Capital

The minimum share capital of the Company is £1 and the maximum is £150,000,000,000.

Structure of the Company

The Mulben Investment Funds is structured as an umbrella company. Provision exists for an unlimited number of sub-funds, and at the date of this report two sub-funds, The VT icf Absolute Return Portfolio and The VT De Lisle America Fund are authorised.

Classes of Shares

The Company can issue different classes of share in respect to any sub-fund.

Valuation Point

The scheme property of the Company and each sub-Fund will normally be valued at 12:00 mid day on each dealing day for the purpose of calculating the price at which shares in the Company may be issued, sold, repurchased or redeemed.

The ACD reserves the right to revalue the Company or any Sub-Fund at any time if it considers it desirable to do so, with the Depositary's approval.

Buying and Selling of Shares

The ACD will accept orders for the purchase and sale of shares on normal business days between 8.30am and 5.30pm. Instructions to buy or sell shares may either be in writing to:

Valu-Trac Investment Management Limited

Orton, Fochabers, Moray, IV32 7QE

Or by email to;

icf@valu-trac.com for deals relating to The VT icf Absolute Return Portfolio

delisle@valu-trac.com for deals relating to The De Lisle America Fund

A contract note will be issued by close of business on the next business day after the dealing date to confirm the transaction.

Pricing Basis

There is a single price for buying, selling and switching shares in a Sub-fund which represents the net asset value of the Sub-fund concerned. The share price is calculated on a forward pricing basis, that is at the next valuation point after the purchase or redemption is deemed to be accepted by the ACD.

The prices of shares are published daily on the Investment Association website at www.fundlistings.com. Neither, the ACD nor the Company can be held responsible for any errors in the publication of the prices. The shares in the Company will be issued and redeemed on a forward pricing basis which means that the price will not necessarily be the same as the published price.

Other information

The Instrument of Incorporation, Prospectus, Key Investor Information Document and the most recent interim and annual reports may be inspected free of charge at the office of the ACD and copies may be obtained upon application.

CORPORATE DIRECTORY

<p>Authorised Corporate Director, Administrator & Registrar</p>	<p>Valu-Trac Investment Management Limited Orton Fochabers Moray IV32 7QE</p> <p>Telephone: 01343 880344 Fax: 01343 880267 Email: icf@valu-trac.com delisle@valu-trac.com</p> <p>Authorised and regulated by the Financial Conduct Authority Registered in England No 2428648</p>
<p>Director</p>	<p>Valu-Trac Investment Management Limited as ACD</p>
<p>Investment Managers</p>	<p>For the VT icf Absolute Return Portfolio: icf management limited Unit 18, Gibbs Reed Farm Pashley Road Ticehurst Wadhurst East Sussex TN5 7HE</p> <p>For the VT de Lisle America Fund: De Lisle Partners LLP Cliff House 8A Westminster Road Poole BH13 6JW</p> <p>Both authorised and regulated by the Financial Conduct Authority</p>
<p>Fund Managers</p>	<p>The VT icf Absolute Return Portfolio Mark Lynam Jeremy Suffield</p> <p>The VT De Lisle America Fund Richard de Lisle</p>
<p>Depository</p>	<p>NatWest Trustee and Depository Services Limited Drummond House 2nd Floor, 1 Redheughs Avenue Edinburgh EH12 9RH</p> <p>Authorised and regulated by the Financial Conduct Authority</p>
<p>Auditor</p>	<p>Johnston Carmichael LLP Chartered Accountants Commerce House South Street Elgin IV30 1JE</p>