

# The VT De Lisle America Fund

## Annual Report

March 2022

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**DE  
LISLE  
PARTNERS**

# **THE MULBEN INVESTMENT FUNDS**

**(Sub-fund The VT De Lisle America Fund)**

**Annual Report and Financial Statements  
for the year ended 31 March 2022**

## CONTENTS

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	<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	3
Independent Auditor's Report to the Shareholders of The Mulben Investment Funds (Sub-funds The VT Global Total Return Fund and The VT De Lisle America Fund)	4
<b>The VT De Lisle America Fund</b>	
Sub-fund Overview	22
Investment Manager's Review	23
Performance Record	25
Portfolio Statement	27
Summary of Material Portfolio Changes	31
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	41
Information for Investors	42
Corporate Directory	43

### End subsection

Assessment of Value (unaudited) The VT De Lisle America Fund	1-5
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## COMPANY OVERVIEW

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### **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 Global Total Return Fund and The VT De Lisle America Fund.

## STATEMENT OF THE AUTHORISED CORPORATE DIRECTOR'S (ACD'S) RESPONSIBILITIES

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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 gains 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

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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

David E. Smith CA

Valu-Trac Investment Management Limited  
Authorised Corporate Director

Date:

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

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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 2022

**INDEPENDENT AUDITOR'S REPORT TO THE SHAREHOLDERS OF THE MULBEN INVESTMENT FUNDS (SUB-FUNDS THE VT GLOBAL TOTAL RETURN FUND AND THE VT DE LISLE AMERICA FUND)**

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**Opinion**

We have audited the financial statements of The Mulben Investment Funds ("the Company") for the year ended 31 March 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 March 2022 and of the net revenue/(expenses) and the net capital gains 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

## SUB-FUND OVERVIEW

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<b>Name of Sub-fund</b>	The VT De Lisle America Fund
<b>Size of Sub-fund</b>	£121,428,053
<b>Launch date</b>	06 August 2010
<b>Investment objective and policy</b>	The Sub-fund will aim to achieve capital and income growth over the long term (5 years).

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 (80%), listed securities, typically common stock and American Depositary Receipts listed on US exchanges, including exchange traded funds. The Sub-fund may also invest in collective investment schemes (including those managed and/or operated by the ACD), transferable securities, cash deposits and money market funds as permitted by the FCA Rules.

The investment policy is subject to the limitations set out in Appendix B of the Prospectus, save in relation to derivatives and investment in collective investment schemes, for which see below.

<b>Investment restriction</b>	The Sub-fund may not invest more than 10% of its value in other collective investment schemes and may not invest in other Sub-funds of the Company.
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<b>Benchmark</b>	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.
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However, the performance of the Sub-fund can be compared to that of the S&P 500.

The performance of the Sub-fund can be compared against that of the benchmark. This benchmark has been selected as it is considered that this index most closely reflects the investments which the Sub-fund will make (and its risk/return objectives) at the current time. For the avoidance of doubt, the Investment Manager is not bound or influenced by the index when making its decisions and can make investments that are not included in the index.

<b>Authorised Corporate Director (ACD)</b>	Valu-Trac Investment Management Limited
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<b>Ex-distribution dates</b>	31 March, 30 September
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<b>Distribution dates</b>	31 May, 30 November
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<b>Individual Savings Account (ISA)</b>	The Sub-fund is a qualifying investment for inclusion in an ISA.
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### **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.

### **Annual management 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 (\$).

<b>Initial charge**</b>	Class A Net Accumulation GBP = 0.0%
	Class B Net Accumulation GBP = 0.0%
	Class B Net Accumulation USD = 0.0%

\*\*The ACD may waive in full or part the initial charge at its discretion.

## INVESTMENT MANAGER'S REVIEW

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### Investment Objectives & Policy

The VT De Lisle America Fund seeks to achieve capital appreciation by investing principally in smaller US companies. We have 163 holdings of which only 17 are large cap. Our mean market cap is \$540 million and our median is \$500 million at year-end, 31 March 2022.

Our largest holding remains FS Bancorp which ended the year at 3.9% of the Fund although that proportion has halved over the year as new investors have come in. The second largest holding is Build-a-Bear Workshop which had a good year and moved up to 2.9% of the Fund. Our third largest holding is Johnson Outdoors at 2.6% which has also sharply reduced over the year due to the increasing size of the Fund.

### Manager's Review

The share classes within the VT De Lisle America Fund rose by 6.49% for the US dollar class and by 11.71% for the sterling class. The sterling class rose more because the pound fell from \$1.378 to \$1.314 over the period and the Fund does not hedge its US dollar exposure. Over the period the Fund's assets under management rose from £55 million to £121 million.

As we review the previous year's report it is clear that we have spent another year in the waiting room after the explosive growth previously. Our relative performance is best measured against our nearest indices which I list in the same order as last year:

S&P 500: +14.03%  
S&P 400 (mid cap): +3.23%  
Russell 2000 (small cap): -6.77%  
S&P 600 (small cap): -0.06%  
Community Bank ETF (proxy for our 22% in banks): -1.06%  
S&P 600 Value Component (300 small cap value stocks): +1.64%

As we can see everything is reversed from last year: the S&P 500 becomes the hardest index to beat and indeed beats our +6.49%. The rest tail away to make us look good, showing that everything we might be compared with made no progress at all!

I wearily point out, as ever, that the S&P 600 beats the Russell 2000 as it has more stringent listing requirements. As I write many investors are shocked at the collapse of the FANGs so below is a cheeky reminder that they are more than capable of falling further:

NASDAQ 100 (Index dominated by FANGs): +13.34%  
Russell Microcap: -12.31%

We see the FANGs were the best place to be in this reversionary year, so they have plenty to give back. There we have a picture of the year, back to the bad old days of the big getting bigger and the small getting crushed just as we have been seeing worldwide since 2006. Was the previous year just an aberration? Was I wrong to call a turn in the Kondratieff cycle at the end of August 2020? We have one clue from all those statistics listed above that larger forces are at work and this reversionary move is but a hiatus. This clue is the small rise in the S&P 600 Value component: if we were really returning to the old world of Growth this should have underperformed the other small caps but it beat them.

The hiatus, which has been going on the whole year, was caused by a succession of slowing down events: the Delta variant, China's slowdown (Evergrande), Omicron, supply chain issues, rising inflation. As growth forecasts fell and the post-vaccine surge in small stocks petered out, investors went back to hide in the low growth world that had worked so successfully for them before. Indeed, bond prices only fell below the start of the period in early 2022.

As inflation, and the expectation of more inflation, steadily rose through 2021 and into 2022, we steadily increased weightings in primary producers. With the invasion of Ukraine on February 24, we increased exposure to grains and every part of natural gas transportation from America to Europe. To fund this, we reduced community bank exposure from 30% of the Fund to a market weighted 19%. Although not at cyclical valuation peaks, they were near their highs which suggested vulnerability to an encroaching recession. Our consumer durables, like our themed Great Outdoors stocks, had already fallen and so we didn't touch them. We were, however, over-optimistic about the effect of their earnings surges on their stock prices. They have fallen to ratings we haven't seen in 40 years, typically of P/Es around 6x, so we are holding on.

## INVESTMENT MANAGER'S REVIEW (Continued)

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We are currently going through a period of great pessimism with all types of investors fearful as stagflation is universally forecast. It has now become apparent to all that as interest rates rise valuation matters. Investors can no longer only take into consideration the marvellous prospects of exciting fast-growing companies. For a while, it was not well appreciated where it was best to hide from the valuation reset but as various hiding places broke down, the message became clear that low P/E is the place to go. For the last several months we have been well protected having, according to Morningstar, a P/E of 6x compared with a typical rating of 14x in the last ten years. This compares us favourably to the S&P 500 which has a rating of 19x even after its recent fall.

The Federal Reserve is in a bind whereby it cannot raise interest rates too aggressively because the dollar is at a 20-year high. Nevertheless, its apparent determination to control inflation means that all now take for granted that a recession is pending. The consequence is that even our low P/E stocks will be challenged: when a recession is imminent and inflation remains high, there is nowhere to hide.

Our strategy has been threefold. We have overweighted consumer durable stocks which we think have received a permanent benefit from the pandemic. We are at least market weight in financials in the form of community banks, and we are overweight primary producers, particularly those brought into focus by the invasion of Ukraine. All of these groups are remarkably cheap compared with past valuations and that is why they combine to give the Fund its low P/E. The danger is in the risk of overambitious interest rate rises causing earnings to collapse. However, several factors bring hope. Debt is with the government not the public this time round so banks are safer and the government has a motive to be gentle.

There is fear, not least because rapid change brings uncertainty. We are mindful that we are at the stage in the cycle where accidents happen and therefore expect the S&P 600 stocks to continue to perform strongly against their less carefully chosen Russell 2000 counterparts as we saw in the figures above.

Accordingly, we want our companies to have strong balance sheets and deep moats. However, these qualities are associated with high P/Es which is in opposition to our philosophy of keeping our P/Es low. Resolving this conundrum keeps pointing the way towards the primary sector where P/E ratings may also be low because the future cannot be discounted for long. For instance, a fertilizer company may have a moat, a strong balance sheet, and have high free cash flow or earnings putting it on 6x. We cannot, however, extrapolate these conditions into the future with the certainty the market formerly gave to technology companies.

Our position going forward is to maintain our focus on grabbing this cash flow now in strong companies that will be around whatever happens in a more uncertain future. As the premium for long duration confidence falls because of rapid external change and rising interest rates, we will not get so discounted by investing in short duration winners which are prospering now. The most obvious place is the commodity companies which currently have the ideal conditions but our consumer durables also have the money taps flowing at a rate which doesn't need to continue for long to make them look cheap. Overall, we hope this period of anticipation of disaster gets resolved before too long so we can focus on the ideal period for small and value which arrives after we get round the U-bend in an inflationary world.

De Lisle Partners LLP  
Investment Manager to the Fund  
24 May 2022

## PERFORMANCE RECORD

### Financial Highlights

#### Class B GBP Net Accumulation

	Year to 31 March 2022	Year to 31 March 2021	Year to 31 March 2020
Changes in net assets per unit	GBP	GBP	GBP
Opening net asset value per unit	536.3718	274.7168	339.3753
Return before operating charges	68.9416	266.2377	(60.6045)
Operating charges (note 1)	(6.1320)	(4.5827)	(4.0540)
Return after operating charges *	62.8096	261.6550	(64.6585)
Closing net asset value per unit	599.1814	536.3718	274.7168
Retained distributions on accumulation shares	2.1001	1.7559	2.9786
*after direct transactions costs of:	0.6246	1.3497	0.5527
Performance			
Return after charges	11.71%	95.25%	(19.05%)
Other information			
Closing net asset value	£73,162,851	£33,283,608	£12,289,856
Closing number of units	12,210,467	6,205,324	4,473,646
Operating charges (note 2)	1.08%	1.13%	1.11%
Direct transaction costs	0.11%	0.33%	0.18%
Prices			
Highest unit price	622.9797	562.8647	394.9343
Lowest unit price	525.3918	254.0508	265.0302

#### Class B USD Net Accumulation

	Year to 31 March 2022	Year to 31 March 2021	Year to 31 March 2020
Changes in net assets per unit	USDc	USDc	USDc
Opening net asset value per unit	477.7795	219.1735	288.3823
Return before operating charges	36.3455	262.5438	(65.8631)
Operating charges (note 1)	(5.3275)	(3.9378)	(3.3457)
Return after operating charges *	31.0180	258.6060	(69.2088)
Closing net asset value per unit	508.7975	477.7795	219.1735
Retained distributions on accumulation shares	1.7899	1.5315	2.4063
*after direct transactions costs of:	0.5426	1.1597	0.4568
Performance			
Return after charges	6.49%	117.99%	(24.00%)
Other information			
Closing net asset value	\$63,641,601	\$30,057,976	\$14,274,346
Closing number of units	12,508,239	6,291,182	6,512,805
Operating charges (note 2)	1.08%	1.13%	1.11%
Direct transaction costs	0.11%	0.33%	0.18%
Prices			
Highest unit price	541.9218	505.0341	332.7986
Lowest unit price	473.8232	201.7165	197.7262

## PERFORMANCE RECORD (Continued)

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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 2022

Holding	Security	Value £	% of Total Net Assets %
<b>Financials (2021 – 38.55%)</b>			
19,234	American National Bankshares Inc (Virginia) com	553,413	0.46
12,968	Ameris Bancorp	445,179	0.37
4,000	Assured Guaranty Ltd	196,813	0.16
4,410	Bank of South Carolina	64,166	0.05
7,500	Bank OZK	249,207	0.21
17,480	BCB Bancorp Inc Common INC	241,680	0.20
22,403	Bar Harbor Bankshares Common Stock	481,866	0.40
5,500	B. Riley Financial Inc	298,012	0.25
15,869	C B Financial Services inc	291,373	0.24
47,033	CF Bankshares Inc	803,534	0.66
4,171	Citizens Financial Group Inc	148,829	0.12
11,206	Clearbridge MLP and Midstream	290,696	0.24
20,853	Colony Bankcorp	296,978	0.24
15,000	Customers Bancorp Inc	607,827	0.50
28,963	Evans Bancorp	856,521	0.71
2,522	First Busey Corporation	49,488	0.04
25,962	First Business Financial Services Inc	653,794	0.54
19,118	First National Cooperation	302,432	0.25
60,258	First United Corporation	1,047,618	0.86
197,236	F S Bancorp Inc	4,722,654	3.89
17,673	Hanmi Financial Corp.	336,956	0.28
5,101	Hingham Institution for Savings	1,360,308	1.12
14,516	Home Bancorp	451,077	0.37
11,306	HV Bancorp	191,003	0.16
36,000	Investors Bancorp Inc	420,774	0.35
23,470	Landmark Bancorp Inc Common USD0.01	478,698	0.39
29,850	MBIA Inc	353,556	0.29
58,557	Medallion Financial Corp	400,345	0.33
32,458	Mercantile Bank Corp	883,929	0.73
59,729	MetroCity Bankshares	1,085,084	0.89
48,476	Mid Penn Bancorp Inc Common USD	990,758	0.82
24,247	Northrim BanCorp Inc	812,047	0.67
5,185	Norwood Financial	113,006	0.09
12,000	OFG Bancorp Common Stock	244,160	0.20
25,134	Oregon Bancorp Inc	842,902	0.69
15,078	People's Bancorp of North Carolina Inc NPV	332,185	0.27
43,968	Plumas Bancorp	1,257,703	1.04
66,894	Primis Financial Corp	718,391	0.59
23,227	Salient Midstream & MLP Fund Common Shares of Beneficial Interest	145,345	0.12
6,740	Salisbury Bancorp	291,790	0.24
2,278	Stock Yards Bancorp Inc	91,961	0.08
8,891	Southern First Bancshares	349,742	0.29
109,129	Sprott Physical Uranium Trust	1,223,533	1.01
10,000	Sterling Bancorp Inc	52,515	0.04
40,320	Timberland Bancorp	848,957	0.70
32,773	Tortoise Energy Infrastructure Corporation Common Stock	862,283	0.71
43,494	Townebank	1,005,460	0.83
5,361	Village Bank And Trust Financial Corp	217,687	0.18
17,156	Umpqua Holdings Corp	252,827	0.21
73,516	U.S. Global Investors Inc	292,213	0.24
32,975	United Insurance Holdings Corp.	83,065	0.07
25,218	Virginia National Bankshares Corp	670,809	0.55
13,500	West Bancorporation	282,345	0.23
29,684	Westwood Holdings Group Inc	341,635	0.28
15,348	William Penn Bancorp	149,443	0.12
		<b>31,036,572</b>	<b>25.57</b>

**PORTFOLIO STATEMENT (continued)**

Security	Value £	% of Total Net Assets %
<b>Consumer Staples (2021 – 0.80%)</b>		
20,000 Andersons Inc	781,396	0.64
21,286 Bunge Ltd	1,780,012	1.47
32,000 Coty Inc. Class A Common Stock	220,608	0.18
29,972 Limoneira Co	316,394	0.26
14,797 Rocky Mountain Chocolate Factory Inc USD0.03	86,052	0.07
10,000 Willamette Valley Vineyards, Inc	69,550	0.06
	<b>3,254,012</b>	<b>2.68</b>
<b>Materials (2021 – 4.11%)</b>		
10,000 Alcoa Corporation	702,624	0.58
60,000 Barrick Gold Corporation	1,136,653	0.94
13,000 CF Industries	1,001,101	0.82
20,000 Cleveland-Cliffs Inc Common Shares	489,707	0.40
204,881 Friedman Industries, Incorporated Common Stock	1,386,684	1.14
15,000 Freeport McMoran Inc	576,615	0.47
13,295 Hawkins Inc	477,431	0.39
8,969 Schnitzer Steel Industries Inc	360,808	0.30
50,989 Mosaic company	2,546,127	2.10
4,000 Nutrien Ltd	311,187	0.26
81,791 Synalloy Corporation	980,612	0.81
31,325 UFP Technologies	1,579,608	1.30
24,087 Venator Materials PLC Ordinary Shares	33,230	0.03
20,000 Worthington Industries	785,817	0.65
	<b>12,368,204</b>	<b>10.19</b>
<b>Consumer Discretionary (2021 – 36.21%)</b>		
16,500 BRP Inc	1,044,510	0.86
250,683 Build-A-Bear Workshop, Inc Common Stock	3,505,141	2.89
1,586 Cannae Holdings, Inc Common Stock	29,447	0.02
203,994 Crown Crafts Inc	1,007,524	0.83
46,369 Escalade, Incorporated	500,619	0.41
178,922 Horizon Global Corp	785,505	0.65
52,202 Johnson Outdoors Inc Class 'A' USD0.05	3,181,433	2.62
21,238 Kewaunee Scientific Corporation	233,584	0.19
74,717 Kirkland's Inc	550,977	0.45
116,108 Lazydays Holdings Inc	1,761,961	1.45
10,083 LCI Industries	819,045	0.67
16,500 Malibu Boats Inc	762,616	0.63
51,229 MarineMax	1,650,678	1.36
116,485 Marine Products Corp USD	1,038,324	0.86
34,098 MasterCraft Boat Holdings Inc	653,497	0.54
15,500 M/I Homes Inc	543,854	0.45
28,015 Myers Industries, Inc Common Shares	458,336	0.38
27,641 OneWater Marine Inc	724,728	0.60
32,000 Party City Holdco Inc. Common Stock	90,853	0.07
21,200 Patrick Industries Inc	1,011,597	0.83
1,500 RH Common Stock	382,286	0.31
161,473 Sally Beauty Holdings, Inc, Common Stock	1,947,630	1.60
15,000 Six Flags Entertainment Corp	499,215	0.41
11,738 Strattec Security Corp	320,466	0.26
34,636 Superior Group of Companies Inc	483,633	0.40
11,705 Thor Industries, Inc. Common Stock	745,697	0.61
3,651 Vail Resorts, Inc. Common Stock	735,802	0.61
44,100 Winnebago Industries	1,860,959	1.53
43,000 YETI Holdings, Inc. Common Stock	2,080,994	1.71
	<b>29,410,911</b>	<b>24.20</b>



**PORTFOLIO STATEMENT (Continued)**

<b>Holding</b>	<b>Security</b>	<b>Value</b> £	<b>% of Total Net Assets</b> %
<b>Real Estate (2021 – 0.14%)</b>			
10,000	Paramount Group Inc	82,888	0.07
		<b>82,888</b>	<b>0.07</b>
<b>Communication (2021 – 0.00%)</b>			
24,000	Thryv Holdings, Inc.	522,892	0.43
		<b>522,892</b>	<b>0.43</b>
<b>Energy (2021 – 2.29%)</b>			
14,000	Apa corp (US)	439,524	0.36
120,000	Birchcliff Energy Ltd	606,000	0.50
234,114	BlueKnight Energy Partners LP	594,202	0.49
210,000	Borr Drilling	535,400	0.44
120,000	Cameco Corp	2,567,816	2.11
60,000	Genovus Energy	763,028	0.63
5,526	Cheniere Energy, Inc.	597,389	0.49
14,866	Chesapeake Energy Corporation	999,028	0.82
57,746	Earthstone Energy, inc Class A Common Stock	584,278	0.48
33,599	Forum Energy Technologies	600,014	0.49
145,000	FTI TechnipFMC	857,063	0.71
19,000	Geospace Technologies Corporation	85,948	0.07
145,000	Golar LNG	2,732,544	2.25
36,149	Greenbrier Companies Inc	1,442,229	1.19
48,400	Macro Enterprises Inc	116,354	0.10
85,551	Martin Midstream Partners LP	264,737	0.22
5,000	MPLX LP Common units representing limited partner	129,096	0.11
13,000	Murphy Oil Corporation Common stock	401,937	0.33
352,604	Nexgen Energy	1,483,506	1.22
50,000	NOV Inc	756,282	0.62
20,000	SM Energy Co	618,822	0.51
250,000	Tellurian Inc	1,036,577	0.85
40,500	Valaris Ltd	1,596,527	1.31
		<b>19,808,301</b>	<b>16.30</b>
<b>Industrials (2021 – 8.83%)</b>			
51,995	Alta Equipment Group	499,933	0.41
23,967	BGSF INC	232,270	0.19
17,039	Blue Bird Corporation	257,921	0.21
19,641	BlueLinx Holdings Common Stock	1,117,448	0.92
33,901	Builders FirstSource Inc	1,755,629	1.45
20,445	DLH Holdings Corporation	301,998	0.25
11,009	DXP Enterprises, Inc	229,702	0.19
10,300	Eastern Company	182,290	0.15
5,272	Espey Manufacturing and Electronics Corp	56,497	0.05
39,100	Gates Industrial Corp	453,878	0.37
206,201	Garrett Motion Inc	1,132,368	0.93
55,641	Gencor Industries Inc	434,692	0.36
63,071	Jewett-Cameron Trading Ltd	331,697	0.27
14,884	L.B. Foster Company	179,128	0.15
152,189	Manitex International	859,537	0.71
70,956	Orion Group Holdings	143,587	0.12
13,132	Steel Partners 6% Preferred	233,962	0.19
12,500	Steel Partners Holdings L.P. Common Units	400,340	0.33
40,907	Sterling Construction Company	867,864	0.71
10,936	Taylor Devices, Inc	83,603	0.07
2,000	Vectrus Inc	55,038	0.05
33,821	Virco Manufacturing Corporation	76,947	0.06
		<b>9,886,329</b>	<b>8.14</b>

PORTFOLIO STATEMENT (Continued)

Holding	Security	Value £	% of Total Net Assets %
<b>Information Technology (2021 – 3.53%)</b>			
269,056	BM Technologies	1,691,841	1.39
193,463	BM Technologies Warrants	190,955	0.16
92,331	Computer Task Group Inc USD0.01	691,070	0.57
74,312	Wayside Technology Group Inc USD0.01	1,977,862	1.63
		<b>4,551,728</b>	<b>3.75</b>
<b>Health (2021 – 3.33%)</b>			
13,000	Affimed N.V,	42,458	0.03
20,000	Agenus Inc	40,015	0.03
9,976	Bicycle Therapeutics	322,925	0.27
27,000	HOKIPA Pharma Inc	42,290	0.03
20,000	Immutep Ltd	42,454	0.03
8,954	Pennant Group INC	125,198	0.11
3,000	SQZ Biotechnologies Company Common Stock	10,884	0.02
7,000	Xenon Pharmaceuticals Inc	160,993	0.14
7,000	WW International	55,407	0.06
		<b>842,624</b>	<b>0.72</b>
	<b>Investment assets (2021 – 97.79%)</b>	<b>111,764,461</b>	<b>92.05</b>
	<b>Net other assets (2021 – 2.55%)</b>	<b>9,905,338</b>	<b>8.15</b>
	<b>Adjustment to revalue assets from mid to bid prices (2021 – (0.34%))</b>	<b>(241,746)</b>	<b>(0.20)</b>
	<b>Net assets</b>	<b>121,428,053</b>	<b>100.00</b>

## SUMMARY OF MATERIAL PORTFOLIO CHANGES

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	£
<b>Total sales for the year (note 14)</b>	<b>24,074,367</b>
Cedar Fair LP	2,304,209
LCI Industries	2,037,891
Select Interior Concepts Inc	1,918,497
Ensign Group Inc	1,230,094
Towne Bank	1,187,585
Nicolet Bankshares Inc	952,613
Ultra Beauty Inc	903,106
Mid Penn Bancorp Inc	846,213
Central Pacific Financial Corp	827,288
CF Industries Holdings Inc	811,332

	£
<b>Total purchases for the year (note 14)</b>	<b>73,200,652</b>
LCI Industries	2,471,050
Yeti Holdings Inc	2,360,455
Bm Technologies Inc	2,181,053
Lazydays Holdings Inc	1,931,483
Cameco Corp	1,674,544
Mosaic Co	1,623,737
Winnebago Industries Inc	1,607,169
Nexgen Energy Ltd	1,445,722
Johnson Outdoors Inc	1,423,580
Bunge Ltd	1,331,618

The above transactions represent the top 10 the sales and purchases during the year.

## STATEMENT OF TOTAL RETURN

For the year ended 31 March 2022

	Notes	2022 £	2021 £
Income			
Net capital gains	2	8,894,918	22,352,445
Revenue	3	1,549,372	653,397
Expenses	4	(951,243)	(401,002)
Interest payable and similar charges	6	<u>(5,469)</u>	<u>(1,246)</u>
Net revenue before taxation		592,660	251,149
Taxation	5	<u>(226,709)</u>	<u>(98,393)</u>
Net revenue after taxation		<u>365,951</u>	<u>152,756</u>
Total return before distributions		9,260,869	22,505,201
Finance costs: distributions	6	<u>(358,605)</u>	<u>(152,756)</u>
<b>Changes in net assets attributable to shareholders from investment activities</b>		<u>8,902,264</u>	<u>22,352,445</u>

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO SHAREHOLDERS

For the year ended 31 March 2022

	2022 £	2021 £
<b>Opening net assets attributable to shareholders</b>	54,939,531	23,661,669
Amounts receivable on creation of shares	78,264,505	16,195,448
Amounts payable on cancellation of shares	(21,138,687)	(7,466,746)
Distribution accumulated	413,645	171,921
Dilution levies	46,795	24,794
Changes in net assets attributable to shareholders from investment activities (see above)	<u>8,902,264</u>	<u>22,352,445</u>
<b>Closing net assets attributable to shareholders</b>	<u>121,428,053</u>	<u>54,939,531</u>

**BALANCE SHEET**

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As at 31 March 2022	Notes	31.03.2022		31.03.2021	
		£	£	£	£
<b>Fixed Assets</b>					
Investment assets			111,522,715		53,539,082
<b>Current Assets</b>					
Debtors	7	1,084,973		553,382	
Cash and bank balances	8	<u>9,399,503</u>		<u>1,986,303</u>	
<b>Total current assets</b>			<u>10,484,476</u>		<u>2,539,685</u>
<b>Total assets</b>			122,007,191		56,078,767
<b>Current Liabilities</b>					
Creditors	9	<u>(579,138)</u>		<u>(1,139,236)</u>	
<b>Total current liabilities</b>			<u>(579,138)</u>		<u>(1,139,236)</u>
<b>Net assets attributable to shareholders</b>			<u>121,428,053</u>		<u>54,939,531</u>

## NOTES TO THE FINANCIAL STATEMENTS

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### For the year ended 31 March 2022

#### 1 Accounting policies

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

##### (a) Basis of accounting

The financial statements have been prepared in accordance with the Statement of Recommended Practice for Authorised Funds (SORP) issued by the Investment Association (IA) in May 2014 and to the amendments to the SORP issued by the IA in June 2017. The functional currency is US dollars and the presentational currency 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 valuation point is 12 noon on 31 March 2022 using bid prices, excluding any accrued interest in the case of fixed interest securities.

##### (h) Foreign exchange

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 allocations 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)**

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<b>2 Net capital gains</b>	<b>2022</b>	<b>2021</b>
The net capital gains comprise:	£	£
Non-derivative securities gains	8,857,340	22,330,792
Transaction charges	(6,989)	(3,914)
Currency gains	44,567	25,567
Total net capital gains	<u>8,894,918</u>	<u>22,352,445</u>

<b>3 Revenue</b>	<b>2022</b>	<b>2021</b>
	£	£
Non-taxable dividends	1,549,112	653,380
Bank interest	260	17
Total revenue	<u>1,549,372</u>	<u>653,397</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:**

ACD fee	897,249	368,195
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**Payable to the Depository, associates of the Depository, and agents of either of them:**

Depository fee	29,853	17,963
Safe custody fee	3,534	824
	<u>33,387</u>	<u>18,787</u>

**Other expenses:**

Audit fee	7,101	7,107
FCA fee	52	65
Legal fees	210	1,800
	<u>7,363</u>	<u>8,972</u>

Other expenses	<u>13,244</u>	<u>5,048</u>
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<b>Total expenses</b>	<u>951,243</u>	<u>401,002</u>
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**NOTES TO THE FINANCIAL STATEMENTS (Continued)**

<b>5 Taxation</b>	<b>2022</b>	<b>2021</b>
	<b>£</b>	<b>£</b>
<b>(a) Analysis of charge in the year</b>		
Irrecoverable overseas withholding tax	226,709	98,393
Total tax charge for the year (note 5b)	<u>226,709</u>	<u>98,393</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 Sub-fund 20.00% (2021:20.00%). The differences are explained below:

Net revenue before UK corporation tax	592,660	251,149
Corporation tax at 20.00% (2021:20.00%)	<u>118,532</u>	<u>50,230</u>
<b>Effects of:</b>		
Revenue not subject to UK corporation tax	(309,822)	(130,676)
Current year expenses not utilised	191,290	80,447
Irrecoverable overseas withholding tax	226,709	98,393
Total tax charge for the year (note 5a)	<u>226,709</u>	<u>98,393</u>

**(c) Provision for deferred taxation**

At 31 March 2022 there is a potential deferred tax asset of £774,316 (31 March 2021: £583,026) 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.

<b>6 Finance costs</b>	<b>2022</b>	<b>2021</b>
	<b>£</b>	<b>£</b>
Interim dividend distribution	41,588	47,131
Final dividend distribution	<u>372,057</u>	<u>124,790</u>
	413,645	171,921
Add: Revenue deducted on cancellation of shares	7,463	9,188
Deduct: Revenue received on issue of shares	<u>(62,503)</u>	<u>(28,353)</u>
<b>Net distribution for the year</b>	358,605	152,756
Interest payable and similar charges	5,469	1,246
<b>Total finance costs</b>	<u>364,074</u>	<u>154,002</u>
<b>Reconciliation of distributions</b>		
Net revenue after taxation	365,951	152,756
Balanced carried forward	<u>(7,346)</u>	<u>-</u>
<b>Net distribution for the year</b>	<u>358,605</u>	<u>152,756</u>



**NOTES TO THE FINANCIAL STATEMENTS (Continued)**

<b>7 Debtors</b>	<b>31.03.2022</b>	<b>31.03.2021</b>
	<b>£</b>	<b>£</b>
Amounts receivable on outstanding settlements	296,345	-
Amounts receivable on issue of shares	698,251	498,157
Overseas dividends	59,609	33,008
Withholding tax recoverable	30,743	22,217
Prepayment	25	-
<b>Total debtors</b>	<b>1,084,973</b>	<b>553,382</b>

<b>8 Cash and bank balances</b>	<b>31.03.2022</b>	<b>31.03.2021</b>
	<b>£</b>	<b>£</b>
Cash and bank balances	9,399,503	1,986,303

<b>9 Creditors</b>	<b>31.03.2022</b>	<b>31.03.2021</b>
	<b>£</b>	<b>£</b>

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

ACD's periodic charge	104,486	51,013
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**Amounts payable to the ACD, associates of the ACD and agents of either of them:**

Depository's fees	3,319	1,627
Safe custody and other bank charges	7,692	2,797
	11,011	4,424

**Other expenses:**

Audit fee	7,052	7,004
FCA fee	4	5
	7,056	7,009

Amounts payable on redemption of shares	26,305	626,005
Amounts payable on outstanding settlements	430,280	450,785
<b>Total creditors</b>	<b>579,138</b>	<b>1,139,236</b>

**10 Shares Held**

**Shares Held - Class B Net Accumulation GBP**

<b>Opening Shares at 01.04.2021</b>	<b>6,205,324</b>
Shares issued during the year	8,916,930
Shares cancelled during the year	(2,911,787)
Shares converted during the year	-
<b>Closing Shares as at 31.03.2022</b>	<b>12,210,467</b>

**Shares Held - Class B Net Accumulation USD**

<b>Opening Shares at 01.04.2021</b>	<b>6,291,182</b>
Shares issued during the year	7,531,188
Shares cancelled during the year	(1,314,131)
Shares converted during the year	-
<b>Closing Shares as at 31.03.2022</b>	<b>12,508,239</b>

**11 Risk Management**

In pursuing its investment objective as stated on page 23, 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.

**NOTES TO THE FINANCIAL STATEMENTS (Continued)**

**11 Risk Management (continued)**

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 31.03.2022 would have increased/decreased by £11,152,272 (2021: £5,353,908).

**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.

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 31.03.2022 would have increased/decreased by £11,753,104 (2021: £5,325,135).

Net currency assets and liabilities consist of:

	Net monetary assets and liabilities		Non-monetary assets		Total net assets	
	£		£		£	
	31.03.2022	31.03.2021	31.03.2022	31.03.2021	31.03.2022	31.03.2021
Sterling	3,897,014	1,688,181	-	-	3,897,014	1,688,181
Canadian dollars	1,773	1,067	367,121	198,213	368,894	199,280
US Dollar	6,006,551	(288,799)	111,155,594	53,340,869	117,162,145	53,052,070
<b>Total</b>	<b>9,905,338</b>	<b>1,400,449</b>	<b>111,522,715</b>	<b>53,539,082</b>	<b>121,428,053</b>	<b>54,939,531</b>

**Interest rate risk**

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

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. These include cash and bank balances.

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

	<b>31.03.2022</b>	<b>31.03.2021</b>
	<b>£</b>	<b>£</b>
Financial assets floating rate	9,399,503	1,986,303
Financial assets non-interest bearing instruments	112,607,688	54,092,464
Financial liabilities non-interest bearing instruments	(579,138)	(1,139,236)
	<b>121,428,053</b>	<b>54,939,531</b>

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

### 11 Financial instruments (Continued)

#### Maturity of financial liabilities

The financial liabilities of the Sub-fund as at 31 March 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 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 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:

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	Assets (£000's)	Liabilities (£000's)
Level 1: Unadjusted quoted price in an active market for an identical instrument	111,523	
Total	111,523	-

### 12 Contingent assets and liabilities

At 31 March 2022, the Sub-fund had no contingent liabilities or commitments (31 March 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 31 March 2021. Since that date, the Sub-fund's quoted price has moved as follows for each share class:

Share Class	Price at 31 March 2022		Price at 29 June 2022	
		GBp		GBp
Class B Net Accumulation GBP		599.1814		557.4274
		USDc		USDc
Class B Net Accumulation USD		508.7975		438.6739

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

### 14 Direct transaction costs

Analysis of total purchase costs	2022		2021	
	£	% of total purchases	£	% of total purchases
Purchases in the year before transaction costs	73,127,788		36,378,036	
Commissions	72,864	0.10%	63,160	0.17%
Total purchase costs	<u>72,864</u>	<u>0.10%</u>	<u>63,160</u>	<u>0.17%</u>
Total purchases including transaction costs	<u>73,200,652</u>		<u>36,441,196</u>	

Analysis of total sale costs	2022		2021	
	£	% of total sales	£	% of total sales
Sales in the year before transaction costs	24,095,094		29,165,639	
Commissions	(20,619)	(0.09%)	(51,284)	0.18%
Taxes & levies	(108)	(0.00%)	(805)	0.00%
Total sale costs	<u>(20,727)</u>	<u>(0.09%)</u>	<u>(52,089)</u>	<u>0.18%</u>
Total sales net of transaction costs	<u>24,074,367</u>		<u>29,113,550</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		2021	
	£	% of average net asset value	£	% of average net asset value
Commissions	93,483	0.11%	114,444	0.33%
Taxes & levies	108	0.00%	805	0.00%
	<u>93,591</u>	<u>0.11%</u>	<u>115,249</u>	<u>0.33%</u>

### 15 Portfolio Dealing Spread

The average portfolio dealing spread at 31 March 2022 is 0.40% (2021: 0.68%).

### 17. 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

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### Final distribution in pence per share

Group 1: Shares purchased prior to 01 October 2021

Group 2 : Shares purchased on or after 01 October 2021 and on or before 31 March 2022

01 October 2021 to 31 March 2022

<b>Class B Net Accumulation GBP</b>	<b>Net Revenue 31.05.2022</b>	<b>Equalisation</b>	<b>Distribution 31.05.2022</b>	<b>Distribution 31.05.2021</b>
Group 1	1.8317p	-	1.8317p	1.2142p
Group 2	0.8751p	0.9566p	1.8317p	1.2142p

<b>Class B Net Accumulation USD</b>	<b>Net Revenue 31.05.2022</b>	<b>Equalisation</b>	<b>Distribution 31.05.2022</b>	<b>Distribution 31.05.2021</b>
Group 1	1.1864p	-	1.1864p	0.7859p
Group 2	0.3839p	0.8025p	1.1864p	0.7859p

### Interim distribution in pence per share

Group 1: Shares purchased prior to 01 April 2021

Group 2 : Shares purchased on or after 01 April 2021 and on or before 30 September 2021

01 April 2021 to 30 September 2021

<b>Class B Net Accumulation GBP</b>	<b>Net Revenue 30.11.2021</b>	<b>Equalisation</b>	<b>Distribution 30.11.2021</b>	<b>Distribution 30.11.2020</b>
Group 1	0.2684p	-	0.2684p	0.5417p
Group 2	0.1447p	0.1237p	0.2684p	0.5417p

<b>Class B Net Accumulation USD</b>	<b>Net Revenue 30.11.2021</b>	<b>Equalisation</b>	<b>Distribution 30.11.2021</b>	<b>Distribution 30.11.2020</b>
Group 1	0.1737p	-	0.1737p	0.3506p
Group 2	0.1608p	0.0129p	0.1737p	0.3506p

### 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) 99.98% of the total dividend allocation together with the tax credit is received as franked investment income.
- ii) 0.02% 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

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### 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.

Each Sub-fund 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 Sub-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 Global Total Return Fund 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 Global Total Return Fund  
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](http://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.

**Remuneration:** Information about the authorised fund manager (AFM) remuneration policies and disclosures is available from Valu-Trac Investment Management Limited on its website which can be found on the link below.  
<https://www.valu-trac.com/VIML%20Remuneration%20Policy%20Statement.pdf>

The AFM does not employ any staff directly from the Company, so there are no quantitative disclosures in this report.

**CORPORATE DIRECTORY**

<p><b>Authorised Corporate Director, Administrator &amp; Registrar</b></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><b>Director</b></p>	<p>Valu-Trac Investment Management Limited as ACD</p>
<p><b>Investment Managers</b></p>	<p>For the VT Global Total Return Fund: icf management limited Unit 1, Gibbs Reed Pashley Road Ticehurst Wadhurst East Sussex TN5 7HE</p> <p>For the VT De Lisle America Fund: De Lisle Partners LLP 3 Firs Lane Poole Dorset BH14 8JG</p> <p>Both authorised and regulated by the Financial Conduct Authority</p>
<p><b>Fund Managers</b></p>	<p>The VT Global Total Return Fund Mark Lynam Charles Gillams</p> <p>The VT De Lisle America Fund Richard de Lisle</p>
<p><b>Depository</b></p>	<p>NatWest Trustee and Depository Services Limited House A Floor 0, 175 Glasgow Road Gogarburn Edinburgh EH12 1HQ</p> <p>Authorised and regulated by the Financial Conduct Authority</p>
<p><b>Auditor</b></p>	<p>Johnston Carmichael LLP Chartered Accountants Commerce House South Street Elgin IV30 1JE</p>

**Statement by the Authorised Fund Manager (AFM) to the shareholders of The VT De Lisle America Fund on the outcome of the AFM's assessment of the value provided to shareholders**

For the year ended 31 March 2022

This assessment is to establish what The VT De Lisle America 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 an overall summary of the assessment.

	Quality of Service	Performance	AFM costs - general	Economies of scale	Comparable market rates	Comparable services	Classes of units	Overall
The VT De Lisle America Fund	● G	● A	● G	● G	● G	● G	● G	● A

The AFM is the Authorised Corporate Director of the Fund, Valu-Trac Investment Management Limited (Valu-Trac). The Investment Manager is De Lisle Partners LLP.

The fund was launched on 6 August 2010.

The fund will aim to achieve capital and income growth over the long term (5 years).

The fund will invest primarily (70%) in equities and other investments in America (and may also invest in Canada).

The fund will invest in, predominantly (80%), listed securities, typically common stock and American Depository Receipts listed on US exchanges, including exchange traded funds.

The fund may also invest in collective investment schemes (including those managed and/or operated by the AFM), transferable securities, cash deposits and money market funds as permitted by the FCA Rules.

	<b>At and for the year ended<sup>1</sup></b>				
	<b>31 March 2022</b>	<b>31 March 2021</b>	<b>31 March 2020</b>	<b>31 March 2019</b>	<b>31 March 2018</b>
<b>Value of fund (per Performance Record)</b>					
Class B GBP Net Accumulation	£73,163k	£33,284k	£12,290k	£14,801k	£18,591k
Class B USD Net Accumulation	\$63,642k	\$30,058k	\$14,274k	\$19,581k	\$21,215k
<b>Shares outstanding</b>					
Class B GBP Net Accumulation	12,210k	6,205k	4,474k	4,361k	5,304k
Class B USD Net Accumulation	12,508k	6,291k	6,513k	6,790k	6,637k
<b>NAV per share</b>					
Class B GBP Net Accumulation	599.18p	536.37p	274.72p	339.38p	350.53p
Class B USD Net Accumulation	508.80c	477.78c	219.17c	288.38c	319.65c
<b>Dividend per share</b>					
Class B GBP Net Accumulation	2.10p	1.76p	2.98p	2.16p	0.43p
Class B USD Net Accumulation	1.79c	1.53c	2.41c	1.85c	0.36c



**Net gains/(losses) (before expenses)**

Capital gains/(losses)	£8,902k	£22,356k	(£5,859k)	(£1,217k)	(£580k)
Total Net gains/(losses)	£10,451k	£23,010k	(£5,125k)	(£518k)	(£131k)

*1 Sources of data is 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. The AFM works closely with DeLisle Partners LLP to coordinate mailings such as annual letters and financial reports to avoid excessive correspondence whilst providing all required reporting on a timely and clear basis. 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 fund 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 achieve long term capital and income growth. Page 1 shows the fund has delivered income in each of the previous five years in the form of dividends.

The Fund is not managed to or constrained by a benchmark, and nor does the AFM use a benchmark in order to assess performance. However, the performance of the fund can be compared to that of the S&P 500 (the Comparator).

To show long-term returns, the total returns generated are shown on the table below compared to the S&P 500 comparator. This is after operating costs, including the fee paid to the investment manager, and transaction costs. Note the comparator has been adjusted for the relevant share class currencies to provide relevant comparison.

	<b>Year ended 31 March 2022 performance</b>	<b>Year ended 31 March 2022 Comparator Performance</b>	<b>5-year performance</b>	<b>5-year Comparator Performance</b>
Class B GBP Net Accumulation	11.71%	19.62%	68.84%	82.01%
Class B USD Net Accumulation	6.49%	14.03%	77.49%	91.75%

*Total return basis has distributions added back in for the share class.*

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 March 2022 were as follows:

	<b>£</b>	<b>% of average fund value</b>
Investment manager's fee	884,749	1.00%
ACD fee	12,500	0.02%
Depositary fee	29,853	0.03%
Audit fee	7,101	0.01%
FCA fee	52	0.00%
Safe custody fee	3,534	0.00%
Other fees	13,244	0.02%
Transaction fee (capital)	6,989	0.01%
Legal fee	210	0.00%
<b>Total costs</b>	<b>958,232</b>	<b>1.09%</b>

Gains for the year (capital and revenue) including costs was £9,261k; there was overseas taxation of £227k.

There were no preliminary charges or redemption charges paid by shareholders during the year.

The need to charge a dilution levy will depend on the volume of sale and redemptions. The AFM may charge a discretionary dilution levy on the sale and redemption of shares if, in its opinion, the existing Shareholders (for sales) or remaining Shareholders (for redemptions) might otherwise be adversely affected, and if charging a dilution levy is, so far as practicable, fair to all shareholders and potential Shareholders. In particular, the dilution levy may be charged in the following circumstances:

- i. where over a dealing period the fund has experienced a large level of net sales or redemptions relative to its size;
- ii. on "large deals". For these purposes are deals in respect of Shares exceeding the sum of: £500,000 in value (or, in respect of Shares denominated in US dollars, \$650,000) and
- iii. where the AFM considers it necessary to protect the interests of the Shareholders.

The total dilution levy charged in the period under review was £47k.

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 North American sector, retail classes where available. This is shown below. Note that the operating charges excludes legal fees and Transaction fees (capital) which is why the operating charge below is 0.01% less than the total costs above.

	<b>Operating charges (excluding capital transaction fees and legal fees)</b>
Class B	1.08%
IA North American (average of 10 largest funds)	1.27%
Source - Morningstar	

The AFM has concluded the costs, and in particular the Investment Manager’s fee is appropriate and justified for the fund with the OCF of the fund being lower than its comparator. The Investment Manager’s fee at 1% is considered appropriate due to the expertise of the manager.

#### **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 charges 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 North American 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 operating charge for the two B class shares (£ and US\$) over the past 5 years is as noted below.

	<b>At and for the year ended</b>				
	<b>31 March 2022</b>	<b>31 March 2021</b>	<b>31 March 2020</b>	<b>31 March 2019</b>	<b>31 March 2018</b>
Operating charges	1.08%	1.13%	1.11%	1.12%	1.15%

The IM fee is charged at 1.00% of the fund value as can be seen in section 3.

## 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
The VT De Lisle America Fund	 G	 A	 G	 G	 G	 G	 G	 A

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; while the performance of the fund is behind the comparator in the period under review and over the objective period, the AFM feels the fund has delivered its objective by providing positive returns. Therefore, it is considered that the shareholders of the VT De Lisle America Fund are receiving reasonable value as shown by the amber rating overall and for performance. The AFM will continue to monitor the performance of the fund against the comparator over the next 12 months.

28 June 2022