

Dragon Trust

Annual Report

for the year ended 30 June 2024

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## Dragon Trust Report of the Manager

Evelyn Partners Fund Solutions Limited, as Manager, presents herewith the Annual Report for Dragon Trust for the year ended 30 June 2024.

Dragon Trust ('the Trust' or 'the Fund') is an authorised unit trust scheme further to an authorisation order dated 13 July 1999 and is a UCITS scheme complying with the investment and borrowing powers rules in the Collective Investment Schemes sourcebook ('COLL'), as published by the Financial Conduct Authority ('FCA').

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

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

The Trust Deed can be inspected at the offices of the Manager.

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

### Investment objective and policy

The objective of the Fund is to deliver a greater total return than our benchmark (made up of 30% FTSE 100; 35% FTSE North America; 10% FTSE Developed Europe excluding UK; 7% FTSE Japan; 8% FTSE AW Asia Pacific excluding Japan, Australia, New Zealand, India and Pakistan; 5% FTSE Emerging Markets; 5% Bank of England Base Rate), after fees, over any 10-year period.

There is no guarantee that this investment objective will be achieved over 10 years, or any other time period.

We use our benchmark as a target for our Fund's return because the benchmark's composition reflects the geographic and economic sectors we invest in.

To meet the objective, the Fund Manager will invest globally in government and corporate bonds with no restriction on their credit quality, equities and commodities. Investment will be made directly in such assets or through collective investment schemes.

Derivatives may be used by the Fund for the purposes of efficient portfolio management and hedging.

The Fund Manager may use all investment powers as permitted by the prospectus, outside the ranges described above, to ensure the Fund is managed in the best interest of investors in times of market irregularities or stress.

The Fund may invest at the Fund Manager's discretion in other transferable securities, money market instruments, warrants, cash and near cash and deposits and units in collective investment schemes. Use may be made of borrowing, cash holdings, hedging and other investment techniques permitted by the FCA Rules.

### Changes affecting the Fund in the year

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

Further information in relation to the Fund is illustrated on page 42.

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

Brian McLean  
Directors  
Evelyn Partners Fund Solutions Limited  
30 September 2024

Mayank Prakash

## Statement of the Manager's responsibilities

The Collective Investment Schemes sourcebook ('COLL') published by the FCA, requires the Manager to prepare financial statements for each annual accounting period which give a true and fair view of the financial position of the Trust and of the net revenue and net capital gains on the scheme property of the Trust for the year.

In preparing the financial statements the Manager is responsible for:

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









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

The Manager is responsible for the management of the Trust in accordance with the Trust Deed, the Prospectus and COLL.




## Assessment of Value - Dragon Trust

In line with the provisions contained within COLL 6.6.20R, the Board of Evelyn Partners Fund Solutions Limited ('EPFL') as Authorised Fund Manager ('AFM'), has carried out an Assessment of Value for Dragon Trust ('the Trust'). Furthermore, the rules require that EPFL publishes these assessments.

A high-level summary of the outcome of EPFL's rigorous review of the Trust, for the year ended 30 June 2024, using the seven criteria set by the FCA is set out below:

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

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

-  On balance, the Board believes the Trust has delivered value to unitholders, with no material issues noted.
-  On balance, the Board believes the Trust has delivered value to unitholders, but may require some action.
-  On balance, the Board believes the Trust has not delivered value to unitholders and significant remedial action is now planned by the Board.

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

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

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

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

The seven criteria are:

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

## Assessment of Value - Dragon Trust (continued)

### 1. Quality of Service

What was assessed in this section?

#### Internal Factors

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

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

#### External Factors

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

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

What was the outcome of the assessment?

#### Internal Factors

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

#### External Factors

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

Were there any follow up actions?

There were no follow-up actions.

### 2. Performance

What was assessed in this section?

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

#### Investment Objective

The Trust seeks to deliver a greater total return than the benchmark (made up of 30% FTSE 100; 35% FTSE North America; 10% FTSE Developed Europe excluding UK; 7% FTSE Japan; 8% FTSE AW Asia Pacific excluding Japan, Australia, New Zealand, India and Pakistan; 5% FTSE Emerging Markets; 5% Bank of England Base Rate), after fees, over any 10-year period.

## Assessment of Value - Dragon Trust (continued)

### 2. Performance (continued)

#### Benchmark

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

The benchmark for the Trust is a composite benchmark, which is target. A 'target' benchmark is an index or similar factor that is part of a target a fund manager has set for a trust's performance to match or exceed, which includes anything used for performance fee calculation. Details of how the Trust had performed against its target benchmark over various timescales can be found below.

#### Cumulative Performance as at 31.05.2024 (%)

	Currency	1 Year	3 Year	5 Year	10 Year
Dragon Trust Composite Benchmark <sup>^</sup>	GBX	16.95	26.02	55.96	143.30
Dragon Trust Income GBP TR	GBP	13.50	1.03	36.90	105.47

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

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

#### What was the outcome of the assessment?

The Board assessed the performance of the Trust over its minimum recommended holding period of ten years and observed that it had underperformed its target benchmark, and as a result an Amber rating was given.

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

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

#### Were there any follow up actions?

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

### 3. AFM Costs

#### What was assessed in this section?

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

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

#### What was the outcome of the assessment?

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

#### Were there any follow up actions?

There were no follow-up actions required.

### 4. Economies of Scale

#### What was assessed in this section?

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

#### What was the outcome of the assessment?

The Investment Manager's fee is a fixed rate however the tiered Manager's periodic charge allows for savings to be returned to the Trust should the AUM increase.

The ancillary charges of the Trust represent 9 basis points<sup>1</sup>. Some of these costs are fixed and as the Trust grows in size, may result in a small reduction in the basis point cost of these services.

<sup>1</sup> One basis point is equal to 1/100th of 1% or 0.01%. Figure calculated at interim report, 31 December 2023.

<sup>^</sup> The composite benchmark comprises of 30% FTSE 100, 35% FTSE North America, 10% FTSE Dev Europe Ex UK, 7% FTSE Japan, 8% FTSE Asia Pacific Ex Japan, Australia, New Zealand, India and Pakistan, 5% FTSE Emerging and 5% Bank of England Base Rate.

## Assessment of Value - Dragon Trust (continued)

### 4. Economies of Scale (continued)

Were there any follow up actions?

There were no follow-up actions required.

### 5. Comparable Market Rates

What was assessed in this section?

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

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

What was the outcome of the assessment?

The OCF of 0.75%<sup>2</sup> compared favourably with those of similar externally managed funds.

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

Were there any follow up actions?

There were no follow-up actions required.

### 6. Comparable Services

What was assessed in this section?

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

What was the outcome of the assessment?

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

Were there any follow up actions?

There were no follow-up actions required.

### 7. Classes of Units

What was assessed in this section?

The Board reviewed the Trust's set-up to ensure that where there are multiple unit classes, unitholders are in the correct unit class given the size of their holding.

What was the outcome of the assessment?

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

Were there any follow up actions?

There were no follow-up actions required.

### Overall Assessment of Value

The Trust underperformed its target benchmark and therefore attracted an Amber rating in Section 2. Notwithstanding that, the Board concluded that Dragon Trust had provided value to investors.

Dean Buckley

Chairman of the Board of Evelyn Partners Fund Solutions Limited

19 August 2024

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

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

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

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

<sup>2</sup> At the interim reporting period 31 December 2023. Following guidance issued by the Investment Association on 30 November 2023, the interim synthetic checked interim accounts and these were published excluding closed ended in OCF calculation.



## Report of the Trustee to the unitholders of Dragon Trust

### Trustee's responsibilities

The Trustee must ensure that the Fund is managed in accordance with the Financial Conduct Authority's Collective Investment Schemes sourcebook, the Financial Services and Markets Act 2000, as amended, (together 'the Regulations'), the Trust Deed and Prospectus (together 'the Scheme documents') as detailed below.

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

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

The Trustee must ensure that:

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

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

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

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

NatWest Trustee and Depositary Services Limited

30 September 2024

## Independent Auditor's report to the unitholders of Dragon Trust

### Opinion

We have audited the financial statements of Dragon Trust (the 'Trust') for the year ended 30 June 2024, which comprise the Statement of total return, Statement of change in net assets attributable to unitholders, Balance sheet, the related Notes to the financial statements, including significant accounting policies and the Distribution table. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland* (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- Give a true and fair view of the financial position of the Trust as at 30 June 2024 and of the net revenue and the net capital gains on the scheme property of the Trust for the year then ended;
- Have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- Have been prepared in accordance with the Investment Association Statement of Recommended Practice for Authorised Funds, the rules of the Collective Investment Schemes sourcebook (COLL Rules) of the Financial Conduct Authority and the Trust Deed.

### Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor responsibilities for the audit of the financial statements section of our report. We are independent of the Trust 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 Manager'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 Trust's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

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

We have nothing to report in this regard.

### Opinions on Other Matters Prescribed by the COLL Rules

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

- Proper accounting records for the Trust 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 Manager for the year is consistent with the financial statements.

## Independent Auditor's report to the unitholders of Dragon Trust (continued)

### Responsibilities of the Manager

As explained more fully in the Statement of the Manager's responsibilities set out on page 3, the Manager 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 Manager 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 Manager is responsible for assessing the Trust'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 Manager either intends to wind up the Trust or to cease operations, or has no realistic alternative but to do so.

### Auditor Responsibilities for the Audit of the Financial Statements

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

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

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

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

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

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

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

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

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

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

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

## Independent Auditor's report to the unitholders of Dragon Trust (continued)

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

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

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

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

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

#### Use of Our Report

This report is made solely to the Trust's unitholders, as a body, in accordance with Rule 4.5.12 of the COLL Rules published by the Financial Conduct Authority under section 247 of the Financial Services and Markets Act 2000. Our audit work has been undertaken so that we might state to the Trust's unitholders 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 Trust and the Trust's unitholders as a body, for our audit work, for this report, or for the opinions we have formed.

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

## Accounting policies of Dragon Trust

for the year ended 30 June 2024

### a Basis of accounting

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

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

### b Valuation of investments

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

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

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

Collective investment schemes are valued at the bid price for dual priced funds and at the single price for single priced funds and are valued at their most recent published price prior to the close of business valuation on 30 June 2024.

### c Foreign exchange

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

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

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

### d Revenue

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

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

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

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

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

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

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

## Accounting policies of Dragon Trust (continued)

for the year ended 30 June 2024

### d Revenue (continued)

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

### e Expenses

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

Bank interest paid is charged to revenue.

### f Allocation of revenue and expenses to multiple unit types

All revenue and expenses which are directly attributable to a particular unit type are allocated to that type. All revenue and expenses which are attributable to the Fund are allocated to the Fund and are normally allocated across the unit types pro rata to the net asset value of each type on a daily basis.

### g Taxation

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

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

Deferred taxation is provided in full on timing differences that result in an obligation at 30 June 2024 to pay more or less tax, at a future date, at rates expected to apply when they crystallise based on current rates and tax laws. Timing differences arise from the inclusion of items of income and expenditure in taxation computations in periods different from those in which they are included in the financial statements. Deferred tax assets and liabilities are not discounted.

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

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

When a disposal of a holding in a non-reporting offshore fund is made, any gain is an offshore income gain and tax will be charged to capital. There may be instances where tax relief is due to revenue for the utilisation of excess management expenses.

### h Efficient Portfolio Management

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

### i Dilution adjustment

A dilution adjustment is an adjustment to the unit price which is determined by the Manager in accordance with the COLL Sourcebook. The Manager may make a dilution adjustment to the price of a unit (which means that the price of a unit is above or below that which would have resulted from mid-market valuation) for the purposes of reducing dilution in the Fund (or to recover an amount which it has already paid or is reasonably expected to pay in the future) in relation to the issue or cancellation of units. Please refer to the Prospectus for further information.

## Accounting policies of Dragon Trust (continued)

for the year ended 30 June 2024

### *j Distribution policies*

#### *i Basis of distribution*

The distribution policy is to distribute all available revenue after deduction of expenses payable from revenue. Distributions attributable to income units are paid to unitholders. Distributions attributable to accumulation units are re-invested in the Fund/relevant class on behalf of the unitholders.

#### *ii Unclaimed distributions*

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

#### *iii Revenue*

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

#### *iv Expenses*

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

#### *v Equalisation*

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

## Investment Manager's report

### Investment performance\*

Date	Unit Price (GBP)
30 June 2023	2.366
30 June 2024	2.675
Performance (Total Return)	1 July 2023 to 30 June 2024
Dragon Trust Income Units	14.87%
Benchmark**	16.42%

The estimated gross annual income at 30 June 2024 was £992,731 (1.73%).

### Investment activities

The largest purchases during the year included:

United States Treasury Note 3.875% 15/08/2033	Schneider Electric
JPMorgan Global Growth & Income Fund	Danaher
LVMH Moët Hennessy Louis Vuitton	S&P Global
London Stock Exchange Group	Phoenix Group Holdings
PepsiCo	Plus500

The largest sales during the year included:

BP	Plus500
United Kingdom Gilt 0.375% 22/10/2026	Accenture
United States Treasury Inflation Indexed Bonds 0.25% 15/07/2029	WisdomTree Physical Gold
United States Treasury Note 0.375% 31/12/2025	Standard Chartered
Palo Alto Networks	Autodesk

During the year the main contributors to performance included:

Intermediate Capital Group	Microsoft
Novo Nordisk	ASML Holding
Alphabet 'A'	Shell
JPMorgan Chase	Meta Platforms 'A'
Amazon.com	First Sentier Investors Global Umbrella Fund - FSSA Indian Subcontinent Fund

During the year the main detractors to performance included:

Gore Street Energy Storage Fund	Taiwan Semiconductor Manufacturing
Align Technology	Mercedes-Benz Group
Ceres Power Holdings	DiscoverIE Group
Yum China Holdings	LVMH Moët Hennessy Louis Vuitton
Prudential	Diageo

### Investment strategy and outlook<sup>^</sup>

2023 ended on a more upbeat tone following what was a fairly tumultuous year with many conflicting economic forces at play.

Much of the year was dominated by the slow pace of falling inflation as economies stabilised post-pandemic and reacted to one of the fastest and largest ever rises in interest rates. The US particularly enjoyed a rapid fall in inflationary pressures and towards the very end of the year the US Federal Reserve signposted the anticipated peak in bond market yields and markets rallied on an anticipated 'pivot' in interest rates as early as quarter 1 2024.

The true health of the US economy, which now represents 67% of the world market, was disguised by the polarisation of the S&P 500. The US market returned 26.3% across 2023 in USD terms but this was dominated by the 'Magnificent 7' stocks, which accounted for around 60% of the overall rise.

\*Source: Evelyn Partners Fund Solutions Limited, Income units, 12pm mid prices.

\*\*Target benchmark - 30% FTSE 100, 35% FTSE North America, 10% FTSE Dev Europe Ex UK, 7% FTSE Japan, 8% FTSE Asia Pacific Ex Japan, Australia, New Zealand, India and Pakistan, 5% FTSE Emerging and 5% Bank of England Base Rate.

<sup>^</sup>Source: Bloomberg.



## Investment Manager's report (continued)

### Investment strategy and outlook (continued)^

The rally in markets that started in the last quarter of 2023 has continued throughout 2024, although the long anticipated easing in interest rates is yet to materialise following more stubborn inflationary pressures. That said, last week the UK economy published inflation of 2.0%, the first time UK inflation has been within the Bank of England's target rates for 3 years or so. US inflation has also fallen significantly from 2023 peaks, and accordingly, it is reasonable to expect that more central banks will start to ease rates soon; the European Central Bank, Switzerland and Canada having already done so. This, in turn, heralds a peak in bond yields, which has historically provided healthy support for equity markets.

In the first half of 2024, markets have generally broadened out both at stock and sector levels, and many companies which had been lacklustre in 2022/23 have been the subject of renewed investor interest. This, in turn, has resulted in encouraging returns for investment portfolios. However, in the near term, uncertainty about the significant change in the political landscape across western markets will likely give consumers cause to pause while also giving investors reason to delay any decisions about increasing exposure to risk assets. This, together with some signs of a slowing US economy, may see markets slow over the summer months. It is generally felt that markets have already priced in the likely outcomes of the elections as identified by the polls, but that cannot take into account any legislation yet to be announced by any incoming government.

The war in Ukraine grinds on, while in the Middle East it appears the conflict is nearing the conclusion of this stage of the conflict; however, there is still the challenge of how Israel and Gaza move forward from here. Concerns over the Chinese economy are still very apparent; however, there are a number of initiatives being pursued to help stimulate the economy.

Rathbones Investment Management Limited

17 July 2024

<sup>^</sup>Source: Bloomberg.

## Summary of portfolio changes

for the year ended 30 June 2024

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

	Cost
	£
Purchases:	
United States Treasury Note 3.875% 15/08/2033	952,853
JPMorgan Global Growth & Income Fund	750,736
LVMH Moët Hennessy Louis Vuitton	673,176
London Stock Exchange Group	646,627
PepsiCo	640,297
Schneider Electric	616,135
Danaher	602,868
S&P Global	596,712
Phoenix Group Holdings	585,921
Plus500	580,232
CRH	575,659
WisdomTree Physical Gold	569,579
Taiwan Semiconductor Manufacturing	558,385
Unilever	551,912
Canadian Pacific Kansas City	548,153
Novartis	538,256
Procter & Gamble	530,440
Persimmon	520,460
Uber Technologies	509,221
ServiceNow	504,870
	Proceeds
	£
Sales:	
BP	1,255,384
United Kingdom Gilt 0.375% 22/10/2026	1,089,036
United States Treasury Inflation Indexed Bonds 0.25% 15/07/2029	962,664
United States Treasury Note 0.375% 31/12/2025	958,070
Palo Alto Networks	906,418
Plus500	770,265
Accenture	760,259
WisdomTree Physical Gold	643,323
Standard Chartered	641,099
Autodesk	620,878
BHP Group	618,636
Gore Street Energy Storage Fund	586,710
Nestlé	547,064
Mercedes-Benz Group	513,798
Roche Holding	508,106
Phoenix Group Holdings 6.625% 18/12/2025	508,004
RELX	455,707
Melrose Industries	452,486
Novo Nordisk	414,375
United States Treasury Note 3.875% 15/08/2033	412,217

Portfolio statement  
as at 30 June 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Debt Securities* 3.37% (6.19%)			
Aaa to Aa2 1.53% (3.69%)			
United Kingdom Gilt 0.875% 31/01/2046	£740,000	364,990	0.64
United States Treasury Note 3.875% 15/08/2033	\$670,000	509,980	0.89
		<u>874,970</u>	<u>1.53</u>
Aa3 to A1 0.00% (1.53%)		-	-
Baa1 to Baa2 1.84% (0.97%)			
Phoenix Group Holdings 7.75% 06/12/2053**	£500,000	521,550	0.91
Barclays 3.75% 22/11/2030**	£550,000	530,855	0.93
		<u>1,052,405</u>	<u>1.84</u>
Total debt securities		<u>1,927,375</u>	<u>3.37</u>
Equities 70.54% (68.63%)			
Equities - United Kingdom 26.55% (28.69%)			
Equities - incorporated in the United Kingdom 21.59% (24.64%)			
Energy 2.43% (5.50%)			
Shell	49,000	1,388,415	2.43
Materials 1.09% (1.19%)			
Rio Tinto	12,000	624,000	1.09
Industrials 4.13% (5.69%)			
DiscoverIE Group	70,000	469,000	0.82
Elixirr International	115,000	632,500	1.11
GlobalData	310,000	672,700	1.18
RELX	16,000	582,080	1.02
		<u>2,356,280</u>	<u>4.13</u>
Consumer Discretionary 0.83% (0.00%)			
Persimmon	35,000	473,025	0.83
Consumer Staples 1.64% (0.87%)			
Diageo	13,000	323,570	0.57
Unilever	14,000	608,160	1.07
		<u>931,730</u>	<u>1.64</u>
Health Care 2.69% (3.55%)			
AstraZeneca	10,000	1,235,400	2.17
PureTech Health	163,412	298,717	0.52
		<u>1,534,117</u>	<u>2.69</u>

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

\*\* Variable interest security.

## Portfolio statement (continued)

as at 30 June 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Equities (continued)			
Equities - United Kingdom (continued)			
Equities - incorporated in the United Kingdom (continued)			
Financials 5.93% (4.83%)			
Draper Esprit	290,000	1,061,400	1.86
Intermediate Capital Group	48,000	1,046,400	1.83
London Stock Exchange Group	7,200	676,512	1.19
Phoenix Group Holdings	115,000	599,725	1.05
		<u>3,384,037</u>	<u>5.93</u>
Information Technology 0.64% (1.66%)			
accesso Technology Group	50,000	363,000	0.64
Communication Services 1.23% (0.69%)			
Team Internet Group	390,000	701,220	1.23
Real Estate 0.98% (0.66%)			
LondonMetric Property	290,000	560,570	0.98
Total equities - incorporated in the United Kingdom		<u>12,316,394</u>	<u>21.59</u>
Equities - incorporated outwith the United Kingdom 4.96% (4.05%)			
Materials 1.58% (1.77%)			
Glencore	200,000	902,200	1.58
Industrials 1.23% (1.14%)			
Experian	19,000	700,340	1.23
Consumer Discretionary 0.79% (0.00%)			
PPHE Hotel Group	35,000	451,500	0.79
Financials 1.36% (1.14%)			
JTC	81,000	777,600	1.36
Total equities - incorporated outwith the United Kingdom		<u>2,831,640</u>	<u>4.96</u>
Total equities - United Kingdom		<u>15,148,034</u>	<u>26.55</u>
Equities - Europe 10.00% (10.10%)			
Equities - Denmark 2.64% (2.45%)			
Novo Nordisk	13,200	1,508,803	2.64
Equities - France 2.19% (0.00%)			
LVMH Moët Hennessy Louis Vuitton	960	580,745	1.02
Schneider Electric	3,500	665,607	1.17
Total equities - France		<u>1,246,352</u>	<u>2.19</u>
Equities - Germany 0.00% (1.26%)		-	-

Portfolio statement (continued)  
as at 30 June 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Equities (continued)			
Equities - Europe (continued)			
Equities - Ireland 2.49% (2.90%)			
CRH	11,000	654,205	1.15
Linde	2,200	763,691	1.34
Total equities - Ireland		<u>1,417,896</u>	<u>2.49</u>
Equities - Netherlands 1.72% (1.36%)			
ASML Holding	1,200	980,796	1.72
Equities - Switzerland 0.96% (2.13%)			
Novartis	6,500	550,007	0.96
Total equities - Europe		<u>5,703,854</u>	<u>10.00</u>
Equities - North America 32.00% (27.09%)			
Equities - Canada 0.99% (0.00%)			
Canadian Pacific Kansas City	9,100	566,473	0.99
Equities - United States 31.01% (27.09%)			
Abbott Laboratories	8,600	706,859	1.24
Adobe	1,900	834,912	1.46
Align Technology	2,300	439,276	0.77
Alphabet 'A'	8,200	1,180,992	2.07
Amazon.com	7,800	1,192,985	2.09
Berkshire Hathaway	1,700	547,319	0.96
Boku Inc	400,000	720,000	1.26
CME Group	3,100	481,982	0.84
Coca-Cola	16,000	805,506	1.41
Danaher	3,000	592,714	1.04
Exxon Mobil	7,500	682,838	1.20
JPMorgan Chase	7,000	1,120,687	1.96
Marvell Technology	15,000	829,800	1.45
Mastercard	2,000	697,745	1.22
Merck	7,200	704,792	1.24
Meta Platforms 'A'	2,000	797,231	1.40
Microsoft	3,400	1,201,660	2.10
Palo Alto Networks	2,500	670,398	1.17
PepsiCo	4,500	587,232	1.03
Procter & Gamble	4,500	586,983	1.03
S&P Global	1,700	600,050	1.05
ServiceNow	1,000	622,561	1.09
Uber Technologies	8,900	511,357	0.90
Walt Disney	7,500	588,442	1.03
Total equities - United States		<u>17,704,321</u>	<u>31.01</u>
Total equities - North America		<u>18,270,794</u>	<u>32.00</u>

## Portfolio statement (continued)

as at 30 June 2024

	Nominal value or holding	Market value £	% of total net assets
Investment			
Equities (continued)			
Equities - Australia 0.00% (1.21%)		-	-
Equities - Taiwan 0.96% (0.00%)			
Taiwan Semiconductor Manufacturing	4,000	550,051	0.96
Equities - Israel 1.03% (1.54%)			
Plus500	26000	588,640	1.03
Total equities		40,261,373	70.54
Closed-Ended Funds 10.38% (10.02%)			
Closed-Ended Funds - incorporated in the United Kingdom 9.36% (9.00%)			
Baillie Gifford Japan Trust	150,000	1,084,500	1.90
JPMorgan American Investment Trust	77,000	766,920	1.34
JPMorgan Asian Investment Trust	200,000	750,000	1.31
JPMorgan Global Growth & Income Fund	150,000	867,000	1.52
JPMorgan US Smaller Companies Investment Trust	290,000	1,122,300	1.97
Pacific Horizon Investment Trust	120,000	756,000	1.32
Total closed-ended funds - incorporated in the United Kingdom		5,346,720	9.36
Closed-Ended Funds - incorporated outwith the United Kingdom 1.02% (1.02%)			
Stonehage Fleming Private Equity A	4,051	2,758	0.00
Stonehage Fleming Private Equity B	17,550	11,949	0.02
VinaCapital Vietnam Opportunity Fund	115,000	568,675	1.00
Total closed-ended funds - incorporated outwith the United Kingdom		583,382	1.02
Total closed-ended funds		5,930,102	10.38
Collective Investment Schemes 13.21% (12.68%)			
UK Authorised Collective Investment Schemes 7.45% (7.97%)			
First Sentier Investors ICVC - FSSA Greater China Growth Fund	65,000	731,776	1.28
Jupiter Japan Income Fund	1,300,000	1,513,590	2.65
M&G Investment Funds - Japan Fund	940,000	1,336,210	2.34
Schroder Asian Income Fund	838,796	674,057	1.18
Total UK authorised collective investment schemes		4,255,633	7.45
Offshore Collective Investment Schemes 5.76% (4.71%)			
First Sentier Investors Global Umbrella Fund - FSSA Indian Subcontinent Fund	39,000	1,504,957	2.64
iShares MSCI USA Small Cap ESG Enhanced UCITS ETF	2,000	772,170	1.35
Veritas Funds - Asian Fund	1,200	1,007,918	1.77
Total offshore collective investment schemes		3,285,045	5.76
Total collective investment schemes		7,540,678	13.21

## Portfolio statement (continued)

as at 30 June 2024

Investment	Nominal value or holding	Market value £	% of total net assets
Exchange Traded Commodities 2.41% (2.25%)			
WisdomTree Physical Gold	8,000	1,377,613	2.41
<hr/>			
Portfolio of investments		57,037,141	99.91
<hr/>			
Other net assets		50,967	0.09
<hr/>			
Total net assets		57,088,108	100.00
<hr/>			

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

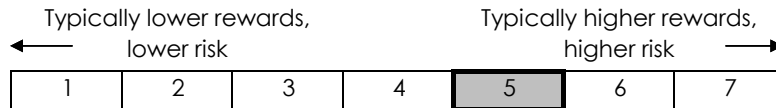
The comparative figures in brackets are as at 30 June 2023.

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

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## Risk and reward profile\*

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



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

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

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

\* As per the KIID published on 26 March 2024.



## Comparative table

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

	2024	2023	2022
	p	p	p
<b>Income</b>			
Change in net assets per unit			
Opening net asset value per unit	234.63	235.48	272.93
Return before operating charges	35.38	4.84	(33.09)
Operating charges	(1.88)	(2.08)	(2.06)
Return after operating charges *	33.50	2.76	(35.15)
Distributions <sup>^</sup>	(3.54)	(3.61)	(2.30)
Closing net asset value per unit	264.59	234.63	235.48
* after direct transaction costs of:	0.18	0.15	0.16
<b>Performance</b>			
Return after charges	14.28%	1.17%	(12.88%)
<b>Other information</b>			
Closing net asset value (£)	55,758,299	49,185,996	50,128,764
Closing number of units	21,073,445	20,963,395	21,288,245
Operating charges <sup>^^</sup>	0.77%	0.87%	0.99%
Direct transaction costs	0.07%	0.06%	0.06%
<b>Published prices</b>			
Highest offer unit price	267.54	253.01	290.21
Lowest bid unit price	226.63	231.93	235.87

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

<sup>^</sup> Rounded to 2 decimal places.

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

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

## Comparative table (continued)

	2024	2023	2022
	p	p	p
<b>Accumulation</b>			
Change in net assets per unit			
Opening net asset value per unit	290.51	286.90	329.49
Return before operating charges	44.02	6.15	(40.11)
Operating charges	(2.33)	(2.54)	(2.48)
Return after operating charges *	41.69	3.61	(42.59)
Distributions <sup>^</sup>	(4.41)	(4.41)	(2.78)
Retained distributions on accumulation units <sup>^</sup>	4.41	4.41	2.78
Closing net asset value per unit	332.20	290.51	286.90
* after direct transaction costs of:	0.23	0.18	0.19
<b>Performance</b>			
Return after charges	14.35%	1.26%	(12.93%)
<b>Other information</b>			
Closing net asset value (£)	1,329,809	1,127,182	1,041,449
Closing number of units	400,300	388,000	363,000
Operating charges <sup>^^</sup>	0.77%	0.87%	0.99%
Direct transaction costs	0.07%	0.06%	0.06%
<b>Published prices</b>			
Highest offer unit price	333.56	309.55	350.35
Lowest bid unit price	280.61	282.60	285.54

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

<sup>^</sup> Rounded to 2 decimal places.

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

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

## Financial statements - Dragon Trust

### Statement of total return for the year ended 30 June 2024

	Notes	2024		2023	
		£	£	£	£
Income:					
Net capital gains / (losses)	2		6,443,593		(129,040)
Revenue	3	1,158,296		1,217,774	
Expenses	4	<u>(354,846)</u>		<u>(352,815)</u>	
Net revenue before taxation		803,450		864,959	
Taxation	5	<u>(42,080)</u>		<u>(93,809)</u>	
Net revenue after taxation			<u>761,370</u>		<u>771,150</u>
Total return before distributions			7,204,963		642,110
Distributions	6		(761,390)		(772,522)
Change in net assets attributable to unitholders from investment activities			<u>6,443,573</u>		<u>(130,412)</u>

### Statement of change in net assets attributable to unitholders for the year ended 30 June 2024

		2024		2023	
		£	£	£	£
Opening net assets attributable to unitholders			50,313,178		51,170,213
Amounts receivable on issue of units		375,205		563,442	
Amounts payable on cancellation of units		<u>(61,224)</u>		<u>(1,306,941)</u>	
			313,981		(743,499)
Change in net assets attributable to unitholders from investment activities			6,443,573		(130,412)
Retained distributions on accumulation units			17,376		16,876
Closing net assets attributable to unitholders			<u>57,088,108</u>		<u>50,313,178</u>

Balance sheet  
as at 30 June 2024

	Notes	2024 £	2023 £
Assets:			
Fixed assets:			
Investments		57,037,141	50,196,722
Current assets:			
Debtors	7	153,283	635,090
Cash and bank balances	8	316,728	449,555
Total assets		<u>57,507,152</u>	<u>51,281,367</u>
Liabilities:			
Creditors:			
Distribution payable		(390,702)	(435,200)
Other creditors	9	(28,342)	(532,989)
Total liabilities		<u>(419,044)</u>	<u>(968,189)</u>
Net assets attributable to unitholders		<u><u>57,088,108</u></u>	<u><u>50,313,178</u></u>

## Notes to the financial statements

for the year ended 30 June 2024

### 1. Accounting policies

The accounting policies are disclosed on pages 12 to 14.

2. Net capital gains / (losses)	2024	2023
	£	£
Non-derivative securities - realised gains	1,957,278	124,361
Non-derivative securities		
- movement in unrealised gains / (losses)	4,508,772	(76,406)
Currency losses	(26,449)	(185,303)
Forward currency contracts gains	4,353	8,122
Transaction charges	(361)	186
Total net capital gains / (losses)	<u>6,443,593</u>	<u>(129,040)</u>
3. Revenue	2024	2023
	£	£
UK revenue	554,309	627,327
Unfranked revenue	28,138	28,908
Overseas revenue	390,806	463,376
Interest on debt securities	155,997	55,230
Bank and deposit interest	29,046	42,933
Total revenue	<u>1,158,296</u>	<u>1,217,774</u>
4. Expenses	2024	2023
	£	£
Payable to the Manager and associates		
Annual management charge*	315,242	321,528
Annual management charge rebate*	(13,127)	(9,116)
Registration fees	-	71
	<u>302,115</u>	<u>312,483</u>
Payable to the Trustee		
Trustee fees	<u>17,261</u>	<u>15,051</u>
Other expenses:		
Audit fee	9,000	7,944
Non-executive directors' fees	1,698	902
Safe custody fees	886	(389)
Bank interest (including futures overdraft interest)	3,081	1,414
FCA fee	407	-
KIID production fee	458	250
Publication fee	-	64
Listing fee	19,348	13,732
Administration fee	592	1,364
	<u>35,470</u>	<u>25,281</u>
Total expenses	<u>354,846</u>	<u>352,815</u>

\* The annual management charge is 0.60% and includes the Manager's periodic charge and the Investment Manager's fees. Where the Manager's periodic charge and the Investment Manager's fee are cumulatively lower than the annual management charge a rebate may occur.

\*For the year ended 30 June 2024, the annual management charge after rebates for each unit class is as follows:

Income:	0.57%
Accumulation:	0.57%

## Notes to the financial statements (continued)

for the year ended 30 June 2024

5. Taxation	2024	2023
	£	£
<i>a. Analysis of the tax charge for the year</i>		
Overseas tax withheld	42,080	93,809
Total taxation (note 5b)	<u>42,080</u>	<u>93,809</u>

### *b. Factors affecting the tax charge for the year*

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

	2024	2023
	£	£
Net revenue before taxation	<u>803,450</u>	<u>864,959</u>
Corporation tax @ 20%	160,690	172,992
Effects of:		
UK revenue	(110,862)	(125,465)
Overseas revenue	(73,977)	(92,676)
Overseas tax withheld	42,080	93,809
Excess management expenses	24,149	45,149
Total taxation (note 5a)	<u>42,080</u>	<u>93,809</u>

### *c. Provision for deferred taxation*

At the year end, a deferred tax asset has not been recognised in respect of timing differences relating to excess management expenses as there is insufficient evidence that the asset will be recovered. The amount of the asset not recognised is £615,848 (2023: £591,699).

## 6. Distributions

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

	2024	2023
	£	£
Interim income distribution	353,922	319,955
Interim accumulation distribution	8,109	6,994
Final income distribution	390,702	435,200
Final accumulation distribution	9,267	9,882
	<u>762,000</u>	<u>772,031</u>
Equalisation:		
Amounts deducted on cancellation of units	253	4,162
Amounts added on issue of units	(863)	(3,671)
Total net distributions	<u>761,390</u>	<u>772,522</u>
Reconciliation between net revenue and distributions:		
Net revenue after taxation per Statement of total return	761,370	771,150
Undistributed revenue brought forward	66	1,438
Undistributed revenue carried forward	(46)	(66)
Distributions	<u>761,390</u>	<u>772,522</u>

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

## Notes to the financial statements (continued)

for the year ended 30 June 2024

7. Debtors	2024	2023
	£	£
Sales awaiting settlement	-	513,649
Currency trades outstanding	-	1,280
Accrued revenue	109,188	107,822
Recoverable overseas withholding tax	41,733	10,387
Prepaid expenses	292	-
Recoverable income tax	920	920
	<u>152,133</u>	<u>634,058</u>
Payable from the Manager and associates		
Annual management charge rebate	<u>1,150</u>	<u>1,032</u>
Total debtors	<u>153,283</u>	<u>635,090</u>
8. Cash and bank balances	2024	2023
	£	£
Total cash and bank balances	<u>316,728</u>	<u>449,555</u>
9. Other creditors	2024	2023
	£	£
Purchases awaiting settlement	-	509,969
Accrued expenses:		
Payable to the Manager and associates		
Annual management charge	<u>1,892</u>	<u>-</u>
Other expenses:		
Trustee fees	103	-
Safe custody fees	666	156
Audit fee	9,000	7,944
Non-executive directors' fees	843	902
FCA fee	81	-
KIID production fee	-	250
Listing fee	15,550	13,732
Transaction charges	207	36
	<u>26,450</u>	<u>23,020</u>
Total accrued expenses	<u>28,342</u>	<u>23,020</u>
Total other creditors	<u>28,342</u>	<u>532,989</u>

## 10. Commitments and contingent liabilities

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

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 11. Unit classes

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

	Income
Opening units in issue	20,963,395
Total units issued in the year	136,000
Total units cancelled in the year	<u>(25,950)</u>
Closing units in issue	<u>21,073,445</u>
	Accumulation
Opening units in issue	388,000
Total units issued in the year	<u>12,300</u>
Closing units in issue	<u>400,300</u>

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

On the winding up of a Fund all the assets of the Fund will be realised and apportioned to the unit classes in relation to the net asset value on the closure date. Unitholders will receive their respective share of the proceeds, net of liabilities and the expenses incurred in the termination in accordance with the FCA regulations. Each unit type has the same rights on winding up.

### 12. Related party transactions

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

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

Amounts payable to the Manager and its associates are disclosed in note 4. The amounts due from/to the Manager and its associates at the balance sheet date are disclosed in notes 7 and 9.

### 13. Events after the balance sheet date

Subsequent to the year end, the net asset value per income unit has decreased from 264.59p to 261.42p and the accumulation unit has decreased from 332.20p to 328.22p as at 24 September 2024. This movement takes into account routine transactions but also reflects the market movements of recent months.

### 14. Transaction costs

#### a Direct transaction costs

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

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

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



## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 14. Transaction costs (continued)

#### a Direct transaction costs (continued)

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

	Purchases before transaction costs		Commission		Taxes		Financial transaction tax		Purchases after transaction costs
	£	£	%	£	%	£	%	£	
2024									
Equities	13,393,399	8,373	0.06%	20,501	0.15%	-	-	13,422,273	
Closed-Ended Funds	1,745,904	-	-	5,884	0.34%	-	-	1,751,788	
Bonds*	2,580,772	-	-	-	-	-	-	2,580,772	
Collective Investment Schemes*	839,617	-	-	-	-	-	-	839,617	
Total	18,559,692	8,373	0.06%	26,385	0.49%	-	-	18,594,450	

	Purchases before transaction costs		Commission		Taxes		Financial transaction tax		Purchases after transaction costs
	£	£	%	£	%	£	%	£	
2023									
Equities	12,419,833	6,427	0.05%	16,302	0.13%	2	0.00%	12,442,563	
Closed-Ended Funds	741,493	-	-	3,708	0.50%	-	-	745,201	
Bonds*	5,538,795	-	-	-	-	-	-	5,538,795	
Collective Investment Schemes	4,999,910	303	0.01%	-	-	-	-	5,000,213	
Total	23,700,031	6,730	0.06%	20,010	0.63%	2	-	23,726,772	

	Sales before transaction costs		Commission		Taxes		Financial transaction tax		Sales after transaction costs
	£	£	%	£	%	£	%	£	
2024									
Equities	12,711,293	(4,009)	0.03%	(12)	0.00%	-	-	12,707,272	
Closed-Ended Funds	1,230,270	(235)	0.02%	(2)	0.00%	-	-	1,230,033	
Bonds*	3,929,991	-	-	-	-	-	-	3,929,991	
Collective Investment Schemes*	340,140	-	-	-	-	-	-	340,140	
Total	18,211,694	(4,244)	0.05%	(14)	0.00%	-	-	18,207,436	

	Sales before transaction costs		Commission		Taxes		Financial transaction tax		Sales after transaction costs
	£	£	%	£	%	£	%	£	
2023									
Equities	8,792,893	(3,649)	0.04%	(94)	0.00%	-	-	8,789,150	
Closed-Ended Funds	1,889,651	(527)	0.03%	-	-	-	-	1,889,124	
Bonds*	2,299,722	-	-	-	-	-	-	2,299,722	
Collective Investment Schemes*	3,263,306	-	-	-	-	-	-	3,263,306	
Total	16,245,572	(4,176)	0.07%	(94)	0.00%	-	-	16,241,302	

\* No direct transaction costs were incurred in these transactions.

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 14. Transaction costs (continued)

#### a Direct transaction costs (continued)

Capital events amount of £92,146 (2023: £6,616) is excluded from the total sales as there were no direct transaction costs charged in these transactions.

Summary of direct transaction costs

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

	£	% of average net asset value
2024		
Commission	12,617	0.02%
Taxes	26,399	0.05%
2023		
Commission	10,905	0.02%
Taxes	20,104	0.04%
Financial transaction tax	2	0.00%

#### b Average portfolio dealing spread

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

The average portfolio dealing spread of the investments at the balance sheet date was 0.19% (2023: 0.24%).

### 15. Risk management policies

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

#### a Market risk

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

##### (i) Other price risk

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

The main elements of the portfolio of investments exposed to this risk are equities, collective investment schemes, closed-ended funds and exchange traded commodities.

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

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

At 30 June 2024, if the price of the investments held by the Fund increased or decreased by 5%, with all other variables remaining constant, then the net assets attributable to unitholders of the Fund would increase or decrease by approximately £2,755,488 (2023: £2,353,973).

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 15. Risk management policies (continued)

#### a Market risk (continued)

#### (ii) Currency risk

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

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

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

	Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
	£	£	£
2024			
Canadian dollar	-	849	849
Danish krone	1,508,803	-	1,508,803
Euro	2,227,148	10,746	2,237,894
Swiss franc	550,007	-	550,007
US dollar	23,698,168	24,358	23,722,526
Total foreign currency exposure	<u>27,984,126</u>	<u>35,953</u>	<u>28,020,079</u>

	Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
	£	£	£
2023			
Danish krone	1,230,610	-	1,230,610
Euro	1,314,150	8,818	1,322,968
Swiss franc	1,072,473	-	1,072,473
US dollar	18,979,517	309,441	19,288,958
Total foreign currency exposure	<u>22,596,750</u>	<u>318,259</u>	<u>22,915,009</u>

At 30 June 2024, if the value of sterling increased or decreased by 5% against all other currencies, with all other variables remaining constant, then the net assets attributable to unitholders of the Fund would increase or decrease by approximately £1,401,004 (2023: £1,131,680).

#### (iii) Interest rate risk

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

During the year the Fund's direct exposure to interest rates consisted of cash and bank balances and interest bearing securities. The amount of revenue receivable from floating rate securities and bank balances or payable on bank overdrafts will be affected by fluctuations in interest rates. The value of interest bearing securities may be affected by changes in the interest rate environment, either globally or locally. In the event of a change in interest rates, there would be no material impact upon the net assets of the Fund.

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 15. Risk management policies (continued)

#### a Market risk (continued)

#### (iii) Interest rate risk (continued)

The Fund would not in normal market conditions hold significant cash balances and would have limited borrowing capabilities as stipulated in the COLL rules.

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

	Variable rate financial assets	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
2024	£	£	£	£	£
Canadian dollar	-	-	849	-	849
Danish krone	-	-	1,508,803	-	1,508,803
Euro	-	-	2,237,894	-	2,237,894
Swiss franc	-	-	550,007	-	550,007
UK sterling	1,369,133	364,990	27,752,950	(419,044)	29,068,029
US dollar	-	509,980	23,212,546	-	23,722,526
	<u>1,369,133</u>	<u>874,970</u>	<u>55,263,049</u>	<u>(419,044)</u>	<u>57,088,108</u>

	Variable rate financial assets	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
2023	£	£	£	£	£
Danish krone	-	-	1,230,610	-	1,230,610
Euro	-	-	1,322,968	-	1,322,968
Swiss franc	-	-	1,072,473	-	1,072,473
UK sterling	449,555	1,258,554	26,658,249	(968,189)	27,398,169
US dollar	936,985	921,719	17,430,254	-	19,288,958
	<u>1,386,540</u>	<u>2,180,273</u>	<u>47,714,554</u>	<u>(968,189)</u>	<u>50,313,178</u>

#### b Credit risk

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

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

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

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

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 15. Risk management policies (continued)

#### b Credit risk (continued)

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

#### c Liquidity risk

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

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

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

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

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

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

All of the financial liabilities are payable on demand.

#### d Fair value of financial assets and financial liabilities

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

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

Basis of valuation	Investment assets	Investment liabilities
	2024	2024
	£	£
Quoted prices	49,216,228	-
Observable market data	7,820,913	-
Unobservable data	-	-
	<u>57,037,141</u>	<u>-</u>

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 15. Risk management policies (continued)

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

Basis of valuation	Investment assets	Investment liabilities
	2023	2023
	£	£
Quoted prices	44,040,885	-
Observable market data	6,155,837	-
Unobservable data	-	-
	<u>50,196,722</u>	<u>-</u>

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

#### e Assets subject to special arrangements arising from their illiquid nature

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

#### f Derivatives

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

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

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

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

#### (i) Counterparties

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

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

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

## Notes to the financial statements (continued)

for the year ended 30 June 2024

### 15. Risk management policies (continued)

#### f Derivatives (continued)

##### (ii) Leverage

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

There have been no leveraging arrangements in the year.

##### (iii) Global exposure

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

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

There have been no collateral arrangements in the year.

## Distribution table

for the year ended 30 June 2024

Interim distributions in pence per unit

Group 1 - Units purchased before 1 July 2023

Group 2 - Units purchased 1 July 2023 to 31 December 2023

	Net revenue	Equalisation	Total distributions 29 February 2024	Total distributions 28 February 2023
Income				
Group 1	1.688	-	1.688	1.533
Group 2	0.810	0.878	1.688	1.533
Accumulation				
Group 1	2.090	-	2.090	1.865
Group 2	2.090	-	2.090	1.865

Final distributions in pence per unit

Group 1 - Units purchased before 1 January 2024

Group 2 - Units purchased 1 January 2024 to 30 June 2024

	Net revenue	Equalisation	Total distributions 31 August 2024	Total distributions 31 August 2023
Income				
Group 1	1.854	-	1.854	2.076
Group 2	1.441	0.413	1.854	2.076
Accumulation				
Group 1	2.315	-	2.315	2.547
Group 2	0.537	1.778	2.315	2.547

### Equalisation

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

### Accumulation distributions

Holders of accumulation units should add the distributions received thereon to the cost of the units for capital gains tax purposes.



## Remuneration

### Remuneration code disclosure

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

### Remuneration committee

The remuneration committee report contained in the Group Report and Financial Statements for the year ended 31 December 2023 includes details on the remuneration policy. The remuneration committee comprises five non-executive directors<sup>1</sup> and is governed by formal terms of reference, which are reviewed and agreed by the board. The committee met eight times during 2023.

### Remuneration policy

The main principles of the remuneration policy are:

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

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

### Remuneration systems

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

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

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

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

## Remuneration (continued)

### Aggregate quantitative information

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

Evelyn Partners Group Limited reviews its MRTs at least annually. These individuals are employed by and provide services to other companies in the Group. It is difficult to apportion remuneration for these individuals in respect of their duties to EPFL. For this reason, the aggregate total remuneration awarded for the year 31 December 2023 for senior management and other MRTs detailed below has not been apportioned.

Table to show the aggregate remuneration split by Senior Management and other MRTs for EPFL		For the period 1 January 2023 to 31 December 2023				
	Fixed	Variable Cash	Variable Equity	Total	No. MRTs	
	£'000	£'000	£'000	£'000		
Senior Management	3,518	1,662	-	5,180	18	
Other MRTs	919	848	-	1,767	5	
<b>Total</b>	<b>4,437</b>	<b>2,510</b>	<b>-</b>	<b>6,947</b>	<b>23</b>	

### Investment Manager

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

## Further information

### Distributions and reporting dates

Where net revenue is available it will be distributed/allocated semi-annually on the last day in February (interim) and 31 August (annual). In the event of a distribution, unitholders will receive a tax voucher.

XD dates:	1 January	interim
	1 July	annual
Reporting dates:	31 December	interim
	30 June	annual

### Buying and selling units

The property of the Fund is valued at 12 noon weekly on every Tuesday plus the last business day of each month, with the exception of Christmas Eve and New Year's Eve or a bank holiday in England and Wales, or the last business day prior to those days annually, where the valuation may be carried out at a time agreed in advance between the Manager and the Trustee, and prices of units are calculated as at that time. Unit dealing is on a forward basis meaning investors can buy and sell units at the next valuation point following receipt of the order.

Prices of units and the estimated yield of the unit classes are published on the following website: [www.trustnet.com](http://www.trustnet.com) or may be obtained by calling 0141 222 1151.

### Benchmark

The target benchmark used for Dragon Trust is composed of:

30% FTSE 100

35% FTSE North America

10% FTSE Developed Europe excluding UK

7% FTSE Japan

8% FTSE AW Asia Pacific excluding Japan, Australia, New Zealand, India and Pakistan

5% FTSE Emerging Markets

5% Bank of England Base Rate

The benchmark is a target of the Fund's return because the benchmark reflects the geographic and economic sectors the Fund invests in.

## Appointments

### Manager and Registered office

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

### Administrator and Registrar

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

### Directors of the Manager

Andrew Baddeley  
Brian McLean  
Mayank Prakash  
Neil Coxhead

### Independent Non-Executive Directors of the Manager

Dean Buckley  
Linda Robinson  
Victoria Muir  
Sally Macdonald

### Non-Executive Directors of the Manager

Paul Wyse - resigned 11 July 2023  
Guy Swarbreck - appointed 21 August 2023

### Investment Manager

Rathbones Investment Management Limited  
Port of Liverpool Building  
Pier Head  
Liverpool L3 1NW  
Authorised and regulated by the Financial Conduct Authority

### Trustee

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

### Auditor

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