

The Headway Fund

Annual Report

for the year ended 30 June 2025

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The Headway Fund Report of the Authorised Corporate Director ('ACD')

Tutman Fund Solutions Limited ('TFSL') (previously Evelyn Partners Fund Solutions Limited), as ACD, presents herewith the Annual Report for The Headway Fund for the year ended 30 June 2025.

The Headway Fund ('the Company' or 'the Fund') is an authorised open-ended investment company with variable capital ('ICVC') further to an authorisation order dated 28 February 2006. The Company is incorporated under registration number IC000373. It 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 ACD is of the opinion that it is appropriate to continue to adopt the going concern basis in the preparation of the accounts as the assets of the Company consist predominantly of securities which are readily realisable and, accordingly, the Company has adequate financial resources to continue in operational existence for the foreseeable future. Further, appropriate accounting policies, consistently applied and supported by reasonable and prudent judgements and estimates, have been used in the preparation of these accounts and applicable accounting standards have been followed.

The Financial Stability Board ('FSB') created the Task Force on Climate-related Financial Disclosures ('TCFD') to improve and increase reporting of climate-related financial information. TFSL 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 TFSL 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.tutman.co.uk/literature/>

The shareholders are not liable for the debts of the Company.

The Company has no Directors other than the ACD.

The Instrument of Incorporation can be inspected at the offices of the ACD.

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

Investment objective and policy

The investment objective of The Headway Fund is to provide capital growth and to a lesser extent income through investing globally in transferable securities, money market instruments, shares in collective investment schemes, deposits, warrants, derivatives and forward transactions (for hedging purposes), that can best take advantage of economic opportunities worldwide.

There is no limit to which the Company can be invested in each sector.

It is the ACD's intention that derivatives be used for hedging purposes using efficient portfolio management style techniques.

The ACD does not intend to have an interest in any immovable property or tangible movable property.

The Company will be managed in a manner that maintains eligibility for the stocks and shares component of an individual savings account.

Report of the Authorised Corporate Director (continued)

Changes affecting the Company in the year

On 30 June 2025, Thesis Holdings Limited bought Evelyn Partners Fund Solutions Limited. Following the completion of the acquisition of Evelyn Partners Fund Solutions Limited, the company has been renamed to Tutman Fund Solutions Limited.

Further information in relation to the Company is illustrated on page 33.

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 ACD, Tutman Fund Solutions Limited.

Neil Coxhead
Director
Tutman Fund Solutions Limited
15 October 2025

Statement of the Authorised Corporate Director's responsibilities

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

In preparing the financial statements the ACD is responsible for:

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

COLL also requires the ACD to carry out an Assessment of Value on the Company previously published within the Annual Report, this assessment can now be found on the ACD's website at:

<https://www.tutman.co.uk/literature/>

The ACD is responsible for the management of the Company in accordance with the Instrument of Incorporation, the Prospectus and COLL.

Report of the Depositary to the shareholders of The Headway Fund

Depositary's responsibilities

The Depositary must ensure that the Company is managed in accordance with the Financial Conduct Authority's Collective Investment Schemes sourcebook, the Open-Ended Investment Companies Regulations 2001 (SI 2001/1228) (the OEIC regulations), as amended, the Financial Services and Markets Act 2000, as amended, (together 'the Regulations'), the Instrument of Incorporation and Prospectus (together 'the Scheme documents') as detailed below.

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

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

The Depositary must ensure that:

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

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

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

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

NatWest Trustee and Depositary Services Limited
15 October 2025

Independent Auditor's report to the shareholders of The Headway Fund

Opinion

We have audited the financial statements of The Headway Fund (the 'Company') for the year ended 30 June 2025, which comprise the Statement of total return, Statement of change in net assets attributable to shareholders, Balance sheet, the related Notes to the financial statements, including significant accounting policies and the Distribution table. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102. *The Financial Reporting Standard applicable in the UK and Republic of Ireland* (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- Give a true and fair view of the financial position of the Company as at 30 June 2025 and of the net revenue and the net capital gains on the scheme property of the Company for the year then ended;
- Have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- Have been prepared in accordance with the Investment Association Statement of Recommended Practice for Authorised Funds, the rules of the Collective Investment Schemes sourcebook (COLL Rules) of the Financial Conduct Authority and the Instrument of Incorporation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions Relating to Going Concern

In auditing the financial statements, we have concluded that the Authorised Corporate Director's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Authorised Corporate Director with respect to going concern are described in the relevant sections of this report.

Other Information

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

We have nothing to report in this regard.

Opinions on Other Matters Prescribed by the COLL Rules

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

- Proper accounting records for the Company have been kept and the accounts are in agreement with those records;
- We have received all the information and explanations which, to the best of our knowledge and belief, are necessary for the purposes of our audit; and
- The information given in the Report of the Authorised Corporate Director for the year is consistent with the financial statements.

Independent Auditor's report to the shareholders of The Headway Fund (continued)

Responsibilities of the Authorised Corporate Director

As explained more fully in the Statement of the Authorised Corporate Director's responsibilities set out on page 4, the Authorised Corporate Director is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Authorised Corporate Director determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Authorised Corporate Director is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Authorised Corporate Director either intends to wind up the Company or to cease operations, or has no realistic alternative but to do so.

Auditor Responsibilities for the Audit of the Financial Statements

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

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

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

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

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

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

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

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

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

Independent Auditor's report to the shareholders of The Headway Fund (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)

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

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

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

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

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

Use of Our Report

This report is made solely to the Company's shareholders, as a body, in accordance with Rule 4.5.12 of the COLL Rules issued by the Financial Conduct Authority under the Open-Ended Investment Companies Regulations 2001. Our audit work has been undertaken so that we might state to the Company's shareholders those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Johnston Carmichael LLP
Chartered Accountants
Statutory Auditor
Bishop's Court
29 Albyn Place
Aberdeen AB10 1YL
15 October 2025

Accounting policies of The Headway Fund

for the year ended 30 June 2025

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

b Valuation of investments

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

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

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

Collective investment schemes are valued at the bid price for dual priced funds and at the single price for single priced funds and are valued at their most recent published price prior to the close of business valuation on 30 June 2025.

Derivatives are valued at the price which would be required to close out the contract at the balance sheet date.

c Foreign exchange

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

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

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

d Revenue

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

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

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

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

Distributions from collective investment schemes which are re-invested on behalf of the Fund are recognised as revenue on the date the securities are quoted ex-dividend and form part of the Fund's distribution.

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

Compensation is treated as either revenue or capital in nature depending on the facts of each particular case.

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

Accounting policies of The Headway Fund (continued)

for the year ended 30 June 2025

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 weekly and at each month end.

Management fee rebates agreed in respect of holdings in other collective investment schemes are recognised on an accruals basis and are allocated to revenue or capital being determined by the allocation of the expense in the collective investment scheme held.

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 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 2025 to pay more or less tax, at a future date, at rates expected to apply when they crystallise based on current rates and tax laws. Timing differences arise from the inclusion of items of income and expenditure in taxation computations in periods different from those in which they are included in the financial statements. Deferred tax assets and liabilities are not discounted.

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

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

g Efficient Portfolio Management

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

h Dilution levy

The need to charge a dilution levy will depend on the volume of sales or redemptions. The ACD may charge a discretionary dilution levy on the sale and redemption of shares if, in its opinion, the existing shareholders (for sales) or remaining shareholders (for redemptions) might otherwise be adversely affected, and if charging a dilution levy is, so far as practicable, fair to all shareholders and potential shareholders. Please refer to the Prospectus for further information.

Accounting policies of The Headway Fund (continued)

for the year ended 30 June 2025

i Distribution policies

i Basis of distribution

The distribution policy is to distribute all available revenue after deduction of expenses payable from revenue. Distributions attributable to income shares are paid to shareholders.

ii Unclaimed distributions

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

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.

Investment Manager's report

Investment performance*

	Share Price	ARC Sterling Steady Growth PCI
30 June 2024	215.70p	311.10
30 June 2025	224.70p	322.78
Return for the period	4.2%	3.8%

The performance of the Fund (capital only) for the year end 30 June 2025 was 4.2%. The value of the assets of the Fund was £11,571,083 as at 30 June 2025.

Investment activities

We sold the holding in iShares Edge MSCI World Value Factor UCITS ETF and iShares MSCI World GBP Hedged UCITS ETF and replaced this exposure with Xtrackers S&P 500 Equal Weight UCITS ETF and top up of Wellington Durable Companies Fund position.

Around this time, we also sold the Fund's position in AXA Fixed Interest Investment ICVC - Sterling Credit Short Duration Bond Fund, topped up Invesco GBP Corporate Bond UCITS ETF and added a direct Gilt holding, UK Treasury Gilt 0.25% 31/07/2031, in a bid to increase duration slightly.

We changed the portfolio's European exposure slightly by reducing Comgest Growth - Europe (subsequently exited the position on 11 March 2025) and topped up Eleva UCITS Fund - Eleva European Selection Fund, preferring its more 'flexible' approach given the current market environment. We also made further adjustments within the portfolio's global equity exposure, selling Fundsmith Equity Fund and switching the proceeds into a Global Equity ETF.

We sold out Ruffer SICAV - Ruffer Total Return International following a period of disappointing performance, and replaced the exposure with Lazard Rathmore Alternative Fund, a strategy which invests across four liquid asset classes with a low correlation to equity markets.

Towards the end of 2024, we adjusted our Emerging Markets and Asian exposure, exiting Vontobel Fund - mtx Sustainable Asian Leaders Ex-Japan, PineBridge Asia ex-Japan Small Cap Equity Fund and GQG Partners Emerging Markets Equity Fund. Proceeds were reinvested into an Asian and Emerging Markets ETFs.

At the beginning of 2025, Allspring Lux Worldwide Fund - Global Long/Short Equity Fund was sold following news that the Fund Manager was leaving.

We also made some further adjustments to the fixed income allocation, redeeming Invesco GBP Corporate Bond UCITS ETF in favour of a new actively managed fund, BlueBay Global Investment Grade Corporate Bond Fund.

Investment strategy and outlook

The primary investment objective of the Fund is to provide long-term capital growth and, as such, the Fund is invested in a diversified range of third-party actively managed funds and passive ETFs, investing across a number of asset classes, with the largest allocation being to global equities. The overall investment strategy of the Fund has not changed over this period.

Bond and equity markets both gained ground over the third quarter as the Federal Reserve ('Fed') and Bank of England finally followed the European Central Bank's lead and started to cut interest rates. There was, however, a noticeable increase in volatility in equity markets and a shift in market leadership away from technology towards more defensive and interest rate sensitive areas. The risks posed by the escalation in the conflict in the Middle East were largely ignored by investors.

Emerging Markets generally outperformed developed markets. Among the larger Emerging Markets, China outperformed most other regions in response to another substantial government stimulus package, whilst India rose and Brazil posted high single digit returns.

* Source: Morningstar Direct 2025, Tutman Fund Solutions Limited and ARC Research.

Investment Manager's report (continued)

Investment strategy and outlook (continued)

The final quarter of the year saw the US equity market enjoy another strong period of performance as US investors reacted positively to Mr Trump's election victory in anticipation of large-scale tax cuts and financial deregulation. In contrast, European and Emerging Markets generally sold off on concerns about Mr Trump's election and the possibility of general tariffs being introduced on all US imports. The strength in the US dollar following the election significantly boosted US equity returns for UK investors.

Despite the interest rate cuts in the US, UK and eurozone, government bond markets fell back over the quarter on concerns about the inflationary implications of Mr Trump's election and the cautious comments from the Fed on future rate cuts. On average, corporate bonds outperformed government bonds modestly over the quarter. Lower quality and shorter dated bonds generally produced better returns.

Markets pulled back in the last month of the year following the Fed pivoting towards a more hawkish direction, leaving investors to digest the prospect of interest rates remaining higher for longer.

The first quarter of 2025 saw a dramatic shift in market leadership, as US equities fell back in favour of Europe and the UK. January was generally a good month for investors, and as stated, Europe and the UK outperformed the US which saw some profit taking from the technology sector following the emergence of the Chinese company DeepSeek as a potential challenger to US dominance in Artificial Intelligence development. Donald Trump's entry into the White House also caused some market uncertainty as it was accompanied by a flurry of executive orders and bizarre suggestions including the annexation of Canada, Panama and Greenland.

Over February, the performance of equity markets was mixed as investors tried to work out the implications of the political and economic announcements flowing from the White House, in particular those related to tariffs and trade. Government bond markets generally move higher over the month on concerns about the outlook for growth given the risk of a trade war between the US and its major trading partners.

In March, markets continued to fall back over President Trump's threats to impose widespread general tariffs at the start of April given the implications for global trade and growth. The month also saw a major increase in borrowing and spending on defence and infrastructure was agreed in Germany and bonds in Europe sold off in response.

As we moved into the second quarter, equity markets sold off sharply at the start of April following President Trump's Liberation Day announcement of a 10% tariff on all imports into the US and so-called "reciprocal" tariffs up to 50% on countries with manufacturing trade imbalance with the US. At its worst point, the US stock market was down over 20% from its February peak and European markets were down around 15%. However, markets quickly bounced back after Trump delayed the reciprocal tariffs for a ninety-day period. This volatility was also reflected in bond markets.

Equity markets continued their recovery into May as the 90 day pause was well received; contrastingly bond markets were less optimistic, with the notable downgrade of US sovereign debt adding volatility.

Energy prices fell in US dollar terms over the second quarter despite a short-lived rally when Israeli bombers attacked Iran. Elsewhere in the commodity space, industrial metal prices rose and precious metals prices, including gold and silver, had another positive quarter.

With all-time highs being reached in the US, market momentum may need more good news to fuel further progress over the summer holiday season. The current 90-day pause on reciprocal trade tariffs expires on 9 July and investors seem to have already priced in a market friendly outcome. Another helpful catalyst for investors has been the hope of a US rate cut at the next Fed meeting in late July, which could be cause for further celebration in equity markets. We do not plan on making any significant changes to the current asset allocation in the short term.

Stanhope Capital LLP
17 July 2025

Portfolio changes

for the year ended 30 June 2025

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

	Cost
	£
Purchases:	
JPMorgan Liquidity Funds - JPM GBP Liquidity LVNAV Select	800,000
iShares S&P 500 GBP Hedged UCITS ETF	794,505
SPDR MSCI World UCITS ETF	596,763
BlueBay Global Investment Grade Corporate Bond Fund	527,349
Xtrackers S&P 500 Equal Weight UCITS ETF	435,637
Lazard Rathmore Alternative Fund	385,468
UK Treasury Gilt 0.25% 31/07/2031	370,963
iShares Core MSCI EM IMI UCITS ETF	331,695
iShares MSCI EM Asia UCITS ETF	255,675
Invesco GBP Corporate Bond UCITS ETF	248,479
JPMorgan US Research Enhanced Index Equity Active UCITS ETF	246,101
Eleva UCITS Fund - Eleva European Selection Fund	241,891
Wellington Durable Companies Fund	122,037
	Proceeds
	£
Sales:	
iShares Core S&P 500 UCITS ETF	791,877
AXA Fixed Interest Investment ICVC - Sterling Credit Short Duration Bond Fund	624,366
JPMorgan Liquidity Funds - JPM GBP Liquidity LVNAV Select	608,792
Invesco GBP Corporate Bond UCITS ETF	522,257
Ruffer SICAV - Ruffer Total Return International	516,550
iShares Edge MSCI World Value Factor UCITS ETF	485,411
Comgest Growth - Europe	394,086
iShares MSCI World GBP Hedged UCITS ETF	347,518
iShares Core MSCI EM IMI UCITS ETF	345,473
GQG Partners Emerging Markets Equity Fund	337,264
Fundsmith Equity Fund	326,336
Allspring Lux Worldwide Fund - Global Long/Short Equity Fund	316,915
iShares MSCI EM Asia UCITS ETF	265,863
Vontobel Fund - mtX Sustainable Asian Leaders Ex-Japan	232,129
HSBC MSCI WORLD UCITS ETF	192,584
PineBridge Asia ex-Japan Small Cap Equity Fund	123,256

Portfolio statement
as at 30 June 2025

Investment	Nominal value or holding	Market value £	% of total net assets
Debt Securities* 3.28% (0.00%) Aa3 to A1 3.28% (0.00%) UK Treasury Gilt 0.25% 31/07/2031	£473,970	<u>380,157</u>	<u>3.28</u>
Equities - Europe 2.16% (1.78%) Altamir	10,185	<u>249,521</u>	<u>2.16</u>
Closed-Ended Funds 2.25% (2.12%) HarbourVest Global Private Equity	10,415	<u>259,854</u>	<u>2.25</u>
Collective Investment Schemes 82.25% (87.95%) UK Authorised Collective Investment Schemes 12.01% (18.39%) Baillie Gifford Long Term Global Growth Investment Fund	42,827	579,451	5.01
First Sentier Investors ICVC - Stewart Investors Asia Pac Leaders Sustainability	22,686	228,789	1.98
Franklin Templeton Funds - FTF Clearbridge Global Infrastructure Income Fund	234,454	267,747	2.31
Trojan Investment Funds - Trojan Fund	93,154	<u>313,714</u>	<u>2.71</u>
Total UK authorised collective investment schemes		<u>1,389,701</u>	<u>12.01</u>
Offshore Collective Investment Schemes 70.24% (69.56%) Amundi Bloomberg Equal-weight Commodity ex-Agriculture UCITS ETF	11,523	223,176	1.93
BlueBay Global Investment Grade Corporate Bond Fund	5,144	531,413	4.59
Cantillon Global Equity Fund Hedged	9,654	518,512	4.48
Dodge & Cox Worldwide Funds - U.S. Stock Fund	17,165	599,923	5.18
Eleva UCITS Fund - Eleva European Selection Fund	477	654,512	5.66
Fulcrum UCITS SICAV - Fulcrum Diversified Absolute Return Fund	2,865	388,477	3.36
HSBC MSCI WORLD UCITS ETF	13,418	395,663	3.42
iShares S&P 500 GBP Hedged UCITS ETF	5,765	814,479	7.04
JPMorgan Liquidity Funds - GBP Liquidity LVNAV Fund	27,891	27,891	0.24
JPMorgan Liquidity Funds - JPM GBP Liquidity LVNAV Select	191,208	191,208	1.65
JPMorgan US Research Enhanced Index Equity Active UCITS ETF	5,205	233,809	2.02
Lazard Rathmore Alternative Fund	2,816	399,498	3.45
Longchamp Dalton Japan Long Only UCITS Fund	244	399,054	3.45
PIMCO Funds - Global Investors Series	71,633	661,893	5.72
Polen Capital Investment Funds - Focus US Growth	24,582	283,673	2.45
SPDR MSCI World UCITS ETF	20,415	640,010	5.53
Velox Fund	2,737	287,634	2.49
Wellington Durable Companies Fund	16,372	466,827	4.03
Xtrackers S&P 500 Equal Weight UCITS ETF	6,430	<u>410,298</u>	<u>3.55</u>
Total offshore collective investment schemes		<u>8,127,950</u>	<u>70.24</u>
Total collective investment schemes		<u>9,517,651</u>	<u>82.25</u>

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

Portfolio statement (continued)
as at 30 June 2025

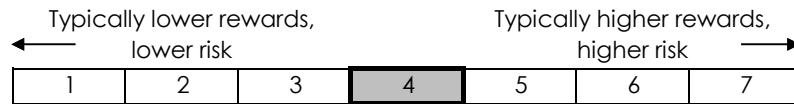
Investment	Nominal value or holding	Market value £	% of total net assets
Exchange Traded Commodities 2.91% (2.15%)			
Gold Bullion Securities	1,532	<u>337,010</u>	<u>2.91</u>
Forward currency contracts 0.00% (-0.05%)		-	-
Portfolio of investments		10,744,193	92.85
Other net assets		826,890	7.15
Total net assets		<u>11,571,083</u>	<u>100.00</u>

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 2024.

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 medium category because the price of its investments have risen or fallen to some extent. 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 2 July 2025.

Comparative table

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

	2025	2024	2023
Net Income Shares	p	p	p
Change in net assets per share			
Opening net asset value per share	214.44	193.82	184.55
Return before operating charges	14.84	25.80	13.48
Operating charges	(3.40)	(3.19)	(3.15)
Return after operating charges *	11.44	22.61	10.33
Distributions [^]	(1.28)	(1.99)	(1.06)
Closing net asset value per share	224.60	214.44	193.82
* after direct transaction costs of:	0.15	0.03	0.05
Performance			
Return after charges	5.33%	11.67%	5.60%
Other information			
Closing net asset value (£)	11,571,083	12,086,470	10,924,669
Closing number of shares	5,151,759	5,636,404	5,636,404
Operating charges ^{^^}	1.55%	1.59%	1.66%
Direct transaction costs	0.07%	0.02%	0.03%
Published prices			
Highest share price	228.6	215.7	196.1
Lowest share price	207.2	188.4	182.6

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

[^] Rounded to 2 decimal places.

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

The OCF includes expenses incurred by underlying holdings of collective investment schemes in relation to the Fund (the synthetic 'OCF').

Financial statements - The Headway Fund

Statement of total return for the year ended 30 June 2025

	Notes	2025		2024	
		£	£	£	£
Income:					
Net capital gains	2		526,199		1,161,801
Revenue	3	203,143		226,110	
Expenses	4	<u>(125,365)</u>		<u>(113,945)</u>	
Net revenue before taxation		77,778		112,165	
Taxation	5	<u>-</u>		<u>-</u>	
Net revenue after taxation			<u>77,778</u>		<u>112,165</u>
Total return before distributions			603,977		1,273,966
Distributions	6		(77,770)		(112,165)
Change in net assets attributable to shareholders from investment activities			<u>526,207</u>		<u>1,161,801</u>

Statement of change in net assets attributable to shareholders for the year ended 30 June 2025

	2025	2024
	£	£
Opening net assets attributable to shareholders	12,086,470	10,924,669
Amounts payable on cancellation of shares	(1,041,594)	-
Change in net assets attributable to shareholders from investment activities	526,207	1,161,801
Closing net assets attributable to shareholders	<u>11,571,083</u>	<u>12,086,470</u>

Balance sheet
as at 30 June 2025

	Notes	2025 £	2024 £
Assets:			
Fixed assets:			
Investments		10,744,193	11,361,976
Current assets:			
Debtors	7	621,878	16,867
Cash and bank balances	8	248,425	792,069
Total assets		<u>11,614,496</u>	<u>12,170,912</u>
Liabilities:			
Investment liabilities		-	(6,556)
Creditors:			
Distribution payable		(27,768)	(62,170)
Other creditors	9	(15,645)	(15,716)
Total liabilities		<u>(43,413)</u>	<u>(84,442)</u>
Net assets attributable to shareholders		<u><u>11,571,083</u></u>	<u><u>12,086,470</u></u>

Notes to the financial statements
for the year ended 30 June 2025

1. Accounting policies

The accounting policies are disclosed on pages 9 to 11.

2. Net capital gains	2025	2024
	£	£
Non-derivative securities - realised gains	903,801	379,172
Non-derivative securities - movement in unrealised (losses) / gains	(414,123)	721,444
Currency losses	(9,415)	(8,697)
Forward currency contracts gains	46,240	67,745
Compensation	-	2,509
Transaction charges	(304)	(372)
Total net capital gains	<u>526,199</u>	<u>1,161,801</u>
3. Revenue	2025	2024
	£	£
UK revenue	16,438	15,841
Unfranked revenue	14,725	22,884
Overseas revenue	136,122	157,948
Interest on debt securities	9,360	-
Bank and deposit interest	25,592	26,970
Rebates from collective investment schemes	906	2,467
Total revenue	<u>203,143</u>	<u>226,110</u>
4. Expenses	2025	2024
	£	£
Payable to the ACD and associates		
ACD's periodic charge*	33,285	25,034
Investment Manager's fee*	70,380	65,733
	<u>103,665</u>	<u>90,767</u>
Payable to the Depositary		
Depositary fees	<u>8,988</u>	<u>9,012</u>
Other expenses:		
Audit fee	9,135	8,700
Non-executive directors' fees	946	1,641
Safe custody fees	596	546
Bank interest	1,564	2,985
FCA fee	157	70
KIID production fee	314	224
	<u>12,712</u>	<u>14,166</u>
Total expenses	<u>125,365</u>	<u>113,945</u>

* For the year ended 30 June 2025, the annual management charge is 0.85% and includes the ACD's periodic charge and the Investment Manager's fee (2024: 0.80%).

Notes to the financial statements (continued)

for the year ended 30 June 2025

5. Taxation	2025	2024
	£	£
<i>a. Analysis of the tax charge for the year</i>		
Total taxation (note 5b)	-	-

b. Factors affecting the tax charge for the year

The tax assessed for the year is lower (2024: lower) than the standard rate of UK corporation tax for an authorised collective investment scheme of 20% (2024: 20%). The differences are explained below:

	2025	2024
	£	£
Net revenue before taxation	77,778	112,165
Corporation tax @ 20%	15,556	22,433
Effects of:		
UK revenue	(3,288)	(3,168)
Overseas revenue	(13,444)	(15,220)
Excess management expenses	1,176	-
Utilisation of excess management expenses	-	(4,045)
Total taxation (note 5a)	-	-

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 £96,914 (2024: £95,738).

6. Distributions

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

	2025	2024
	£	£
Interim income distribution	41,597	49,995
Final income distribution	27,768	62,170
	69,365	112,165
Equalisation:		
Amounts deducted on cancellation of shares	8,405	-
Total net distributions	77,770	112,165
Reconciliation between net revenue and distributions:		
Net revenue after taxation per Statement of total return	77,778	112,165
Undistributed revenue brought forward	1	1
Undistributed revenue carried forward	(9)	(1)
Distributions	77,770	112,165

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

Notes to the financial statements (continued)

for the year ended 30 June 2025

7. Debtors	2025	2024
	£	£
Sales awaiting settlement	612,606	-
Accrued revenue	6,481	11,438
Recoverable overseas withholding tax	2,355	2,331
Prepaid expenses	-	114
Recoverable income tax	436	215
Prepaid overdraft interest	-	1,585
Accrued rebates from collective investment schemes	-	1,184
Total debtors	<u>621,878</u>	<u>16,867</u>
8. Cash and bank balances	2025	2024
	£	£
Total cash and bank balances	<u>248,425</u>	<u>792,069</u>
9. Other creditors	2025	2024
	£	£
Accrued expenses:		
Payable to the ACD and associates		
ACD's periodic charge	-	137
Investment Manager's fee	5,705	5,696
	<u>5,705</u>	<u>5,833</u>
Other expenses:		
Depository fees	-	49
Safe custody fees	630	407
Audit fee	9,136	8,700
Non-executive directors' fees	-	689
FCA fee	37	21
Transaction charges	137	17
	<u>9,940</u>	<u>9,883</u>
Total other creditors	<u>15,645</u>	<u>15,716</u>

10. Commitments and contingent liabilities

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

11. Share classes

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

	Net Income Shares
Opening shares in issue	5,636,404
Total shares cancelled in the year	(484,645)
Closing shares in issue	<u>5,151,759</u>

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

12. Related party transactions

Tutman Fund Solutions Limited (previously Evelyn Partners Fund Solutions Limited), as ACD is a related party due to its ability to act in respect of the operations of the Fund.

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

Notes to the financial statements (continued)

for the year ended 30 June 2025

12. Related party transactions (continued)

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

13. Events after the balance sheet date

Subsequent to the year end, the net asset value per Net Income Shares has increased from 224.6p to 239.1p as at 13 October 2025. This movement takes into account routine transactions but also reflects the market movements of recent months.

14. Transaction costs

a Direct transaction costs

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

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

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

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

	Purchases before transaction costs			Commission		Taxes		Purchases after transaction costs
	£	£	%	£	%	£	£	
2025								
Bonds	370,407	556	0.15%	-	-	-	-	370,963
Collective Investment Schemes	4,981,555	4,045	0.08%	-	-	-	-	4,985,600
Total	<u>5,351,962</u>	<u>4,601</u>	<u>0.23%</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>5,356,563</u>

	Purchases before transaction costs			Commission		Taxes		Purchases after transaction costs
	£	£	%	£	%	£	£	
2024								
Closed-Ended Funds	240,327	360	0.15%	1	0.00%	1	0.00%	240,688
Collective Investment Schemes	1,174,481	1,516	0.13%	-	-	-	-	1,175,997
Total	<u>1,414,808</u>	<u>1,876</u>	<u>0.28%</u>	<u>1</u>	<u>0.00%</u>	<u>1</u>	<u>0.00%</u>	<u>1,416,685</u>

	Sales before transaction costs			Commission		Taxes		Sales after transaction costs
	£	£	%	£	%	£	£	
2025								
Collective Investment Schemes	6,434,473	(3,796)	0.06%	-	-	-	-	6,430,677

	Sales before transaction costs			Commission		Taxes		Sales after transaction costs
	£	£	%	£	%	£	£	
2024								
Collective Investment Schemes*	1,713,140	-	-	-	-	-	-	1,713,140

* No direct transaction costs were incurred in these transactions.

Notes to the financial statements (continued)

for the year ended 30 June 2025

14. Transaction costs (continued)

a Direct transaction costs (continued)

Summary of direct transaction costs

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

		% of average net asset value
2025	£	
Commission	8,397	0.07%
2024	£	% of average net asset value
Commission	1,876	0.02%
Taxes	1	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 0.03% (2024: 0.11%).

15. Risk management policies

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

a Market risk

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

(i) Other price risk

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

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

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

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

At 30 June 2025, if the price of the investments held by the Fund increased or decreased by 5%, with all other variables remaining constant, then the net assets attributable to shareholders of the Fund would increase or decrease by approximately £518,202 (2024: £568,099).

Notes to the financial statements (continued)

for the year ended 30 June 2025

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
	£	£	£
2025			
Euro	937,708	2,355	940,063
US dollar	395,133	612,606	1,007,739
Total foreign currency exposure	<u>1,332,841</u>	<u>614,961</u>	<u>1,947,802</u>

	Financial instruments and cash holdings	Net debtors and creditors	Total net foreign currency exposure
	£	£	£
2024			
Euro	1,212,570	2,331	1,214,901
US dollar	1,283,451	-	1,283,451
Total foreign currency exposure	<u>2,496,021</u>	<u>2,331</u>	<u>2,498,352</u>

At 30 June 2025, if the value of sterling increased or decreased by 5% against all other currencies, with all other variables remaining constant, then the net assets attributable to shareholders of the Fund would increase or decrease by approximately £97,390 (2024: £59,128).

(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 Fund also has indirect exposure to interest rate risk as it invests in bond funds. The amount of revenue receivable from bank balances or payable on bank overdrafts will be affected by fluctuations in interest rates. The value of interest bearing securities may be affected by changes in the interest rate environment, either globally or locally.

In the event of a change in interest rates, there would be no material impact upon the net assets of the Fund.

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

Derivative contracts are not used to hedge against the exposure to interest rate risk.

Notes to the financial statements (continued)

for the year ended 30 June 2025

15. Risk management policies (continued)

a Market risk (continued)

(iii) Interest rate risk (continued)

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

	Variable rate financial assets	Fixed rate financial assets	Non-interest bearing financial assets	Non-interest bearing financial liabilities	Total
2025	£	£	£	£	£
Euro	33,675	-	906,388	-	940,063
UK sterling	156,627	380,157	9,129,910	(43,413)	9,623,281
US dollar	58,123	-	949,616	-	1,007,739
	<u>248,425</u>	<u>380,157</u>	<u>10,985,914</u>	<u>(43,413)</u>	<u>11,571,083</u>

There is no exposure to interest bearing securities in the prior year.

b Credit risk

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

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

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

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

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

c Liquidity risk

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

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

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

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

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

All of the financial liabilities are payable on demand.

Notes to the financial statements (continued)

for the year ended 30 June 2025

15. Risk management policies (continued)

d Fair value of financial assets and financial liabilities

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

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

Basis of valuation	Investment	Investment
	assets	liabilities
	2025	2025
	£	£
Quoted prices	3,943,977	-
Observable market data	6,800,216	-
Unobservable data	-	-
	<u>10,744,193</u>	<u>-</u>

Basis of valuation	Investment	Investment
	assets	liabilities
	2024	2024
	£	£
Quoted prices	3,439,126	-
Observable market data	7,922,850	(6,556)
Unobservable data	-	-
	<u>11,361,976</u>	<u>(6,556)</u>

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

e Assets subject to special arrangements arising from their illiquid nature

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

f Derivatives

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

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

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.

Notes to the financial statements (continued)

for the year ended 30 June 2025

15. Risk management policies (continued)

f Derivatives (continued)

(i) Counterparties

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

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

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

(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 2025

Interim distribution in pence per share

Group 1 - Shares purchased before 1 July 2024

Group 2 - Shares purchased 1 July 2024 to 31 December 2024

	Net revenue	Equalisation	Total distribution 30 April 2025	Total distribution 30 April 2024
Net Income Shares				
Group 1	0.738	-	0.738	0.887
Group 2	0.738	-	0.738	0.887

Final distribution in pence per share

Group 1 - Shares purchased before 1 January 2025

Group 2 - Shares purchased 1 January 2025 to 30 June 2025

	Net revenue	Equalisation	Total distribution 31 October 2025	Total distribution 31 October 2024
Net Income Shares				
Group 1	0.539	-	0.539	1.103
Group 2	0.539	-	0.539	1.103

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 2024 includes details on the remuneration policy. The remuneration committee comprises three independent non-executive directors¹ and is governed by formal terms of reference, which are reviewed and agreed by the board. The committee met seven times during 2024.

Remuneration policy

The main principles of the remuneration policy are:

- aligns the interests of employees with those of our clients/customers and investors;
- is compliant with relevant regulation and considers market best practice;
- is pragmatic, flexible, economic, and considers the commercial objectives of the business;
- is competitive and helps the Group attract and retain talented people;
- encourages behaviours consistent with the Group's values, ambitions, strategy, and risk appetite (including environmental, social and governance risk factors);
- supports the delivery of fair outcomes for our clients; and
- is clear, fair, free from bias and based on objective criteria that avoids discrimination (including gender).

Remuneration systems

Fixed pay is determined by considering an employee's role and responsibilities, external market information, and internal budgets/affordability. The remuneration committee considers all of these factors when determining appropriate salary/fixed profit share budgets as part of the annual pay review, and by exception any increases outside of the annual pay review.

Evelyn Partners operates Discretionary Incentive Plans (DIP) – these are discretionary bonus schemes that enable employees to be recognised for their hard work and commitment, through linking reward to the performance and outcomes, including client outcomes, of both the business and the individual employee.

Bonus awards under a DIP are made in cash and/or equity awards and are driven by the following factors:

- The financial performance (primarily EBITDA performance) of the business;
- An employee's individual performance in relation to the Group's key performance indicators and financial outcomes;
- An employee's individual performance in relation to behaviours which are in line with the Group's values, which includes client outcomes and regulatory compliance; and
- A risk and control review, which includes client outcomes.

¹ Please note that the data provided for the independent non-executive directors is as at 31 December 2024. 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 70 employees is £3.58 million of which £3.19 million is fixed remuneration. This is based on the salary and benefits for those identified as working in EPFL as at 31 December 2024. Any variable remuneration is awarded for the year ended 31 December 2024. 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 ended 31 December 2024 for senior management and other MRTs detailed below has not been apportioned.

Table to show the aggregate remuneration split b		For the period 1 January 2024 to 31 December 2024				
Senior Management and other MRTs for EPFL		Fixed	Variable	Variable	Total	No. MRTs
		£'000	Cash	Equity	£'000	
		£'000	£'000	£'000	£'000	
Senior Management		3,448	2,470	-	5,918	15
Other MRTs		477	338	-	815	5
Total		3,925	2,808	-	6,733	20

Investment Manager

The ACD has appointed Stanhope Capital LLP to provide investment management and related advisory services to the ACD. Stanhope Capital LLP is paid a monthly fee out of the scheme property of The Headway Fund which is calculated on the total value of the portfolio of investments at the month end. Stanhope Capital LLP are 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 semi-annually on 31 October (final) and 30 April (interim). In the event of a distribution, shareholders will receive a tax voucher.

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

Buying and selling shares

The property of the Fund is valued at 12 noon on Mondays of each week, but excluding the Monday falling in the same week as the last business day of the month, when the Fund will value on that day and with the exception of any bank holiday in England and Wales or the last business day prior to those days annually, where the valuation may be carried out at a time agreed in advance between the ACD and the Depositary; and prices of shares are calculated as at that time. Share dealing is on a forward basis i.e. investors can buy and sell shares at the next valuation point following receipt of the order.

Prices of shares and the estimated yield of the Fund are published on the following website: www.trustnet.com or may be obtained by calling 0141 483 9701.

Benchmark

Shareholders may compare the performance of the Company against the ARC Sterling Steady Growth PCI. Comparison of the Company's performance against this benchmark will give shareholders an indication of how the Company is performing against an index based on the real performance numbers delivered to discretionary private clients by participating Investment Managers.

The benchmark is not a target for the Company, nor is the Company constrained by the benchmark.

Appointments

ACD and Registered office

Tutman Fund Solutions Limited (previously Evelyn Partners Fund Solutions Limited)
Exchange Building
St John's Street
Chichester
West Sussex PO19 1UP
Authorised and regulated by the Financial Conduct Authority

Administrator and Registrar

Tutman Fund Solutions Limited (previously Evelyn Partners Fund Solutions Limited)
177 Bothwell Street
Glasgow G2 7ER
Telephone: 0141 483 9700 (Dealing)
0141 483 9701 (Enquiries)
Authorised and regulated by the Financial Conduct Authority

Directors of the ACD

Andrew Baddeley - resigned 31 March 2025
Mayank Prakash - resigned 30 April 2025
Brian McLean - resigned 30 June 2025
Neil Coxhead
Stephen Mugford - appointed 1 July 2025
Nicola Palios - appointed 1 July 2025

Independent Non-Executive Directors of the ACD

Dean Buckley - resigned 30 June 2025
Victoria Muir - resigned 30 June 2025
Linda Robinson
Sally Macdonald
Carol Lawson - appointed 30 June 2025
Caroline Willson - appointed 30 June 2025

Non-Executive Directors of the ACD

Guy Swarbreck - resigned 31 March 2025

Investment Manager

Stanhope Capital LLP
35 Portman Square
London W1H 6LR
Authorised and regulated by the Financial Conduct Authority

Depositary

NatWest Trustee and Depositary Services Limited
Trustee and Depositary Services
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