CFP Sanford DeLand Funds

Annual Report & Accounts

For the year from 1 March 2023 to 28 February 2024

A UK Authorised Investment Company with Variable Capital

Contents

Management & Administration

Registered Office and Directors

Authorised Corporate Director ("ACD") and registered office:

ConBrio Fund Partners Limited

Exchange Building, St John's Street,
Chichester, West Sussex PO19 1UP

ConBrio Fund Partners Limited is authorised and regulated by the Financial Conduct Authority ("FCA") and is a member of The Investment Association ("IA").

Directors of the ACD

John Eckersley	(Managing Partner Resigned 8 December 2023)
Kathryn Holland	(Head of Finance Resigned 8 December 2023)
Timothy Saunt	(Non-Executive Director Resigned 8 December 2023)
Richard Slattery-Vickers	(Partner Resigned 8 December 2023)
S. R. Mugford	(Finance Director Appointed 8 December 2023)
D. W. Tyerman	(Chief Executive Officer Appointed 8 December 2023)
S. E. Noone	(Client Service Director Appointed 8 December 2023)
D. K. Mytnik	(Non-Executive Director Appointed 8 December 2023)
V. R. Smith	(Non-Executive Director Appointed 8 December 2023)
C. A. E Lawson	(Independent Non-Executive Director)
C. J. Wilson	(Independent Non-Executive Director Appointed 8 December 2023)
N. C. Palios	(Non-Executive Chair Appointed 8 December 2023)

All directors are also directors of Thesis Unit Trust Management Limited and members of the governing body of TUTMAN LLP, both authorised fund managers within the same group. D.W. Tyerman, S.R. Mugford and S.E. Noone perform senior management functions within those entities. D.W. Tyerman and S.R. Mugford also hold directorships of other entities within the Thesis group and also perform senior management functions within Thesis Asset Management Limited.

D. K. Mytnik, V. R. Smith and N. C. Palios also hold non-executive directorships of other companies within the Thesis group. They and C. J. Willson and C. A. E. Lawson are not engaged in other business activities that are of significance to the Company.

Investment Adviser

Sanford DeLand Asset Management Ltd ("SDL")
7 Park Row,
Leeds, LS1 5HD
(Authorised and regulated by the FCA)

Depositary

NatWest Trustee and Depositary Services Limited
250 Bishopsgate, London
United Kingdom, EC2M 4AA
(Authorised and regulated by the FCA)

Auditor

Beever and Struthers
One Express
1 George Leigh Street, Manchester, M4 5DL

Administrator

Northern Trust Global Services SE, UK Branch
50 Bank Street, Canary Wharf,
London, E14 5NT
(Authorised and regulated by the FCA)

Registrar

SS&C Financial Services Europe Limited
St Nicholas Lane
Basildon, Essex, SS15 5FS
(Authorised and regulated by the FCA)

Management & Administration

Company Information

CFP Sanford DeLand Funds is an Investment Company with Variable Capital under regulation 12 of the Open-Ended Investment Company Regulations and incorporated in England and Wales under registered number 925651 and authorised by the Financial Conduct Authority with effect from 5 May 2020. Shareholders are not liable for the debts of the Company. At the year end, the Company contained two sub-funds.

The Company is a UCITS scheme which complies with the Financial Conduct Authority's Collective Investment Schemes Sourcebook and is structured as an umbrella company so that different sub-funds may be established from time to time by the ACD with the approval of the Financial Conduct Authority and the agreement of the Depositary.

Important Notes

On 8th December 2023, following receipt of approval from the Financial Conduct Authority, Thesis Unit Trust Management Limited, a leading UK independent authorised fund manager, completed the acquisition of ConBrio Fund Partners Limited from Castlefield Partners Limited. ConBrio Fund Partners Limited remains the authorised corporate director of CFP Castlefield Funds, CFP Castlefield Portfolio Funds and CFP Sanford DeLand Funds ("Funds"). Documentation relating to the Funds is still available on the Conbrio Funds website. The directors of ConBrio have changed, as has the registered address for ConBrio and the Funds, which is now Exchange Building, St John's Street, Chichester, West Sussex PO19 1UP.

From time to time, major macroeconomic events occur and cause significant short-term volatility to capital markets. Russia's military action is an example of such an event. We are monitoring the situation very closely and will continue to manage our funds in line with their respective objectives.

Management & Administration

Report of the ACD to the Shareholders of the Company

The ACD, as sole director, presents its report and the audited financial statements of the Company for the year from 1 March 2023 to 28 February 2024.

The Investment Objectives and Policies of the sub-funds of the Company are covered in the section for each sub-fund. The names and addresses of the ACD, the Depositary, the Registrar, the Investment Adviser and the Auditor are detailed on page 2.

In the future there may be other sub-funds of the Company.

Where a sub-fund invests in other Collective Investment Schemes, the maximum annual management fee that may be charged to that Collective Investment Scheme is 5% of the net asset value of such a scheme, however, it is expected that the actual annual management fee will not exceed 2%.

There are no significant shareholders that require disclosure (i.e. greater than 10%).

Assessment of Value (unaudited)

The regulator – the Financial Conduct Authority ("FCA") – requires each Authorised Corporate Director to annually assess the value of the sub-funds that they operate and manage on behalf of investors. This assessment of value is conducted against seven criteria, as mandated by the FCA, that encompass several considerations of assessment alongside traditional factors such as performance and cost. The latest report conducted by ConBrio Fund Partners Limited on behalf of investors within the CFP Sanford DeLand Funds can be found on the website www.conbriofunds.com.

Remuneration Disclosure

The provisions of the Undertakings in Collective Investment Schemes Directive ("UCITS V") took effect on 18 March 2016. The legislation made requirement for the Authorised Corporate Director ("ACD") to establish and maintain remuneration policies for its staff, the purpose of which is consistent with and to promote sound and effective risk management.

The ACD is part of a larger group of companies and subject to the formal Remuneration Policy of that Group. Any and all remuneration policies are subjected to annual review.

The Group avoids basing rewards on excessive variable remuneration but pays what is believed to be fair fixed remuneration. As an employee owned company, equity ownership amongst all colleagues is encouraged which creates a bias for reward based upon long term shareholder value creation.

The total remuneration of those individuals who are fully or partly involved in the activities of the UCITS scheme for the financial year ending 31 August 2023 is stated below and includes all members of staff that are considered to be senior management or others whose actions may have a material impact on the risk profile of the sub-fund.

Within the Group, all staff are employed by the parent company with none employed directly by the UCITS scheme. The costs included within the below, part of which is attributable to Directors of the management company, is allocated between the entities within the Group.

Fixed Remuneration: £246,193

Number of Full Time Employees: 9

Management has reviewed the general principles of the Remuneration Policy and its application in the last year which has resulted in no material changes to the policy.

Management & Administration

Responsibilities of the Authorised Corporate Director ("ACD")

The Open-Ended Investment Companies Regulations 2001 (the "OEIC Regulations") and the Collective Investment Schemes sourcebook ("COLL Rules") published by the FCA requires the ACD to prepare financial statements for each annual accounting year which give a true and fair view of the financial position of the Company and of the net revenue and net capital gains/(losses) on the 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 and the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association (now known as 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; and
- taking reasonable steps for the prevention and detection of fraud and irregularities.

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

Conbrio Fund Partners Limited

Authorised Corporate Director

West Sussex

22 May 2024

Management & Administration

Statement of Disclosure to the Auditors

So far as the ACD is aware, there is no relevant audit information of which the sub-funds' Auditors are unaware. Additionally, the ACD has taken all the necessary steps that it ought to have taken as ACD in order to make themselves aware of all relevant audit information to establish that the sub-funds' Auditors are aware of the information.

Sub-fund Cross-holdings

No sub-fund held shares in any other sub-fund within the Investment Company with Variable Capital during the year.

Directors' Statement

In accordance with the requirements of the Open-Ended Investment Companies Regulations 2001 (the "OEIC Regulations"), the Collective Investment Schemes sourcebook ("COLL Rules"), we hereby certify this Annual Report & Accounts on behalf of the ACD, ConBrio Fund Partners Limited.

D. W. Tyerman	**S. E. Noone**
Director (of the ACD)	Director (of the ACD)
22 May 2024	22 May 2024

Management & Administration

Statement of the Depositary's Responsibilities and Report of the Depositary to the Shareholders of CFP Sanford DeLand Funds ("the Company") for the Year Ended 28 February 2024.

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

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

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

The Depositary must ensure that:

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

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

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

(i) has carried out the issue, sale, redemption and cancellation, and calculation of the price of the Company's shares and the application of the Company's income in accordance with the Regulations and the Scheme documents of the Company, and

(ii) has observed the investment and borrowing powers and restrictions applicable to the Company.

NatWest Trustee and Depositary Services Limited

22 May 2024

Management & Administration

Independent Auditor's report

Report of the Independent Auditor to the Shareholders of CFP Sanford DeLand Funds

Year Ended 28 February 2024

Opinion

We have audited the financial statements of the CFP Sanford DeLand Funds ("the Company") for the year from 1 March 2023 to 28 February 2024 which comprise the statements of total return and statements of changes in net assets attributable to shareholders together with the balance sheet for each of the Company's sub-funds, the accounting policies of the Company set out on pages 11 and 12 and the related notes and the distribution tables for each of the Company's sub-funds. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" (United Kingdom Generally Accepted Accounting Practice) and the Statement of Recommended Practice issued by the Investment Management Association (IMA) in May 2014 "Financial Statements of UK Authorised Firms" and the 2017 amendments.

In our opinion the Financial Statements:

- give a true and fair view of the financial position of the Company comprising each of its sub-funds as at 28 February 2024 and of the net revenue/expenses and the net capital gains/losses on the property of the company comprising each of its sub-funds for the year then ended; and

- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice including FRS102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", the Instrument of Incorporation, the Statement of Recommended Practice issued by the IMA relating to UK Authorised Funds and the Collective Investment Scheme's Sourcebook rules.

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's responsibilities for the audit of 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 financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our 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 Directors' 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.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of the Authorised Corporate Director for the Financial Statements

As explained more fully in the Authorised Corporate Director's responsibilities statement on page 5, the Authorised Corporate Director is responsible for the preparation of the financial statements in accordance with the applicable framework and for being satisfied that they give a true and fair view, and for such internal control and 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.

Management & Administration

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 relating to going concern and using the going concern basis of accounting unless the Authorised Corporate Director either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Opinions on other matters prescribed by the rules of the Collective Investment Schemes Sourcebook of the Financial Conduct Authority

In our opinion:

- the financial statements have been properly prepared in accordance with the Statement of Recommended Practice relating to Authorised Funds, the rules of the Collective Investment Schemes Sourcebook of the Financial Conduct Authority and the Instrument of Incorporation; and
- the information given in the Authorised Corporate Director's report for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we are required to report by exception

We have nothing to report in respect of the following matters in relation to which the Collective Investment Schemes Sourcebook of the Financial Conduct Authority rules requires us to report to you if, in our opinion:

- we have not received all the information and explanations which, to the best of our knowledge and belief, are necessary for the purposes of our audit; and
- proper accounting records have not been kept or that the financial statements are not in accordance with those records.

Auditor's responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of noncompliance 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 identified areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements based on our understanding of the company and through discussion with the Authorised Corporate Director and other management (as required by auditing standards).

We also had regard to laws and regulations in areas that directly affect the financial statements including financial reporting. We considered the extent of compliance with those laws and regulations as part of our procedures on the related financial statements.

We evaluated management's incentives and opportunities for fraudulent manipulation of the financial statements (including the risk of override of controls), and determined that the principal risks were related to posting inappropriate journal entries to increase revenue or to overstate the value of investments and increase the net asset value of the company.

We communicated identified laws and regulations throughout our team and remained alert to any indications of non-compliance throughout the audit.

Audit procedures performed included:

- Discussions with management, inquiring over known or suspected instances of non-compliance with laws, regulations, and fraud;
- Review of all approved minutes of Board meetings of the Authorised Corporate Director;
- Review and testing of transactions (including journals) posted as part of the financial statements preparation process by the Fund Accountant;
- Review of key business processes and evaluation of internal controls implemented by the Fund accountant designed to prevent and detect irregularities; and
- Designing audit procedures to incorporate unpredictability around the nature, timing or extent of our testing.

There are inherent limitations in the audit procedures described above. We did not identify any such irregularities however as with any audit, there remained a higher risk of non-detection of irregularities due to fraud, as these may involve deliberate concealment, collusion, forger, intentional omissions, misrepresentations, or the override of internal controls.

Management & Administration

The maintenance and integrity of the Funds website is the responsibility of the ACD. The work carried out by the auditors does not involve consideration of these matters.

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

Use of Our Report

This report is made solely to the Company's shareholders, as a body, in accordance with Rule 4.5.12 of the Collective Investment Scheme's Sourcebook 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 any responsibility to anyone other than the Company and the Company's shareholders as a body, for our audit work, for this report, or for the opinions we have formed.

Caroline Monk BA FCA

For and on behalf of Beever and Struthers, Chartered Accountant and Statutory Auditor

One Express

1 George Leigh Street, Manchester

M4 5DL

22 May 2024

Management & Administration

Aggregated notes to the Financial Statements

1. Statement of Compliance

The Financial Statements have been prepared in compliance with UK Financial Reporting Standard 102 (FRS 102) and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Association in May 2014 (2014 SORP) and the 2017 amendments.

2. Summary of Significant Accounting Policies

Basis of Preparation

The Financial Statements have been prepared on a going concern basis, under the historical cost convention as modified by the revaluation of certain financial assets and liabilities measured at fair value through profit or loss. The principal accounting policies which have been applied consistently are set out below.

Functional and Presentation Currency

The functional and presentation currency of the sub-funds is Sterling.

Revenue Recognition

Revenue from quoted equity and non-equity shares is recognised net of attributable tax credits when the security is quoted ex-dividend. Overseas revenue received after the deduction of withholding tax is shown gross of taxation, with the taxation consequences shown within the taxation charge. Bank interest and other revenue are recognised on an accruals basis.

Stock Dividends

The ordinary element of stocks received in lieu of cash dividends is recognised as revenue of the sub-funds. Any enhancement above the cash dividend is treated as capital.

Special Dividends

Special dividends are recognised as either revenue or capital depending upon the nature and circumstances of the dividend.

Expenses

For accounting purposes, all expenses (other than those relating to the purchase and sale of Investments) are charged against revenue for the year on an accruals basis.

Distributions

Amounts distributable are calculated after excluding expenses as agreed by the ACD and Depositary. Equalisation received from the underlying investments has been treated as a reduction in the book cost of the investments and not distributed. All distributions unclaimed for a period of six years after having become due for payment shall be forfeited and shall revert to the capital of the sub-funds.

Valuations

All investments are valued at their fair value at close of business on 28 February 2024 being the last business day of the financial year. The fair value of equity and non-equity shares is bid price, excluding any accrued interest. Delisted and unquoted investments are shown at the ACD's valuation.

Foreign Currencies

Assets and liabilities in currencies other than Sterling are translated into Sterling at the exchange rates prevailing at close of business on the last working day of the accounting year. Transactions in foreign currencies are translated at the exchange rate prevailing at the transaction date.

Management & Administration

Taxation

Corporation tax has been provided at 20%. Deferred tax is provided in respect of timing differences that have originated but not been reversed at the balance sheet date. Deferred tax assets are recognised only to the extent that they are more likely than not to be recoverable. Withholding tax on overseas dividends is accounted for when the security is quoted ex-dividend.

Dilution Levy

In certain circumstances the ACD may charge a dilution levy, in accordance with the FCA Regulations, on all subscriptions and redemptions of shares, which is paid into the sub-funds and included in the Statement of Change in Net Assets Attributable to Shareholders. The levy is intended to cover certain dealing charges not included in the mid-market value of the sub-funds used in calculating the share price, which could have a diluting effect on the performance of the sub-funds.

3. Risk Management Frameworks

The ACD has a documented risk management framework which details the processes and procedures used to identify, measure, manage and monitor appropriately all risks to which the sub-funds are or may be exposed. The risks covered by the framework include market risk, liquidity risk, credit/counterparty risk, operational risk and any other risks that might be material to the sub-funds. The first three risks are primarily focused on the investment itself while operational risk refers to the risk of loss arising from inadequate or failed processes, people or systems including attempted fraud. The risk framework details:

- the techniques, tools and arrangements including systems and processes used;
- the content and frequency of reports; and
- the allocation of responsibilities between key staff and departments.

The main risk management system used by the ACD is fully integrated with the position keeping system for the sub-funds and is used to measure and monitor market risk, credit/counterparty risk and liquidity risk.

A separate system is maintained to track instances of operational risk and monitor amendments to controls made seeking to ensure that operational risk errors do not re-occur. As part of its governance processes, the ACD reviews the performance of the risk management framework and its associated arrangements, processes, systems and techniques on an annual basis, and the compliance of the sub-funds with the risk management framework. The risk management framework is updated by the ACD following any significant change in the business or in risk exposures and at least annually. It is also reviewed by the Depositary.

Market Risk

Market risk is the risk of loss arising from fluctuations in the market value of investments held by the sub-funds attributable to changes in market variables, such as equity prices, foreign exchange rates, interest rates or the credit worthiness of an issuer. The risk management framework monitors the levels of market risk to which the sub-funds are exposed in relation to the sub-fund investment objective and policy. A series of hard (strictly enforced) and soft (warning) limits are employed to ensure the sub-fund stays within its published mandate. The risk systems provide a range of risk analytical tools, including sensitivities to relevant market risks, Value at Risk stress testing, and incorporates the impact of changes to positions in real time. In addition to risk analytics, the risk system has an integrated risk limit and regulatory compliance function which performs checks on potential trades prior to the sub-fund executing them and on the sub-fund exposures on a daily basis. Market risk is also measured using gross leverage and global exposure (the commitment approach). The commitment approach is suitable for sub-funds investing in traditional asset classes such as equities, fixed income, money market securities and collective investment schemes. It can also be used for sub-funds using derivatives in a simple manner and investing in instruments with embedded derivatives where no additional leverage is created. The ACD may in some instances, and always following the guidelines set by the regulator, take account of legally enforceable netting and hedging arrangements when calculating global exposure where these arrangements do not disregard any obvious or material risks.

Management & Administration

Liquidity Risk

Liquidity risk is the possibility that the sub-fund will not be able to sell its assets without incurring losses within the timeframe required to meet investor redemptions. The asset liquidity profile of each sub-fund is monitored on a regular basis and compared to both historical investor redemption patterns and potential redemption scenarios, with the aim of ensuring that the sub-fund will be able to meet any actual redemptions in a timely manner. The liquidity risk management process includes an assessment of the market turnover, percentage of an issue held by the sub-fund, credit rating of the issuer and/or the buysell spread of the market in the securities held where the information is available and is applicable. Liquidity profile stress tests under both normal and exceptional conditions are conducted on a regular basis. If market liquidity is perceived to be decreasing, the ACD might seek to take any of the following actions to improve the liquidity profile of a sub-fund: maintain higher cash balances; maintain a greater proportion of assets in securities which are traditionally more liquid; diversify the range of issue types and sizes held; hold shorter dated securities; or hold issues with a more diversified investor base.

Credit Risk

Credit risk comprises both credit issuer risk and counterparty risk. Credit issuer risk is the potential for loss arising from the issuer of a security failing to pay interest and principal in a timely manner. Counterparty risk is the potential for loss arising from the failure of a trading counterparty to honour an obligation to the sub-fund. The sub-funds manage credit issuer risk as a component of market risk. Counterparty risk arises primarily with the financial brokers through whom the sub-fund buys and sells securities.

The sub-funds may only transact with brokers from an approved broker list maintained by the ACD. All brokers on the ACD approved list are subject to regular credit and general business checks. The sub-funds may also be exposed to counterparty risks arising from the use of forward currency instruments, usually transacted to decrease exposure to foreign currency. These risks are monitored daily and are subject to limits, in practice they are for small amounts typically less than 0.1% of the sub-fund assets.

CFP SDL UK Buffettology Fund

Sub-fund information

The Comparative Tables on pages 15 and 16 give the performance of each active share class in the sub-fund.

The 'Total return after operating charges' disclosed in the Comparative Tables are calculated as the return after operating charges per share divided by the opening net asset value per share. It differs from the sub-fund's performance disclosed in the Investment Adviser's report which is calculated based on the latest published price.

Portfolio transaction costs are incurred when investments are bought or sold by a sub-fund in order to achieve the investment objective. These transaction costs affect an investor in different ways depending on whether they are joining, leaving or continuing with their investment in the sub-fund.

In addition, there are indirect portfolio transaction costs arising from the 'dealing spread' – the difference between the buying and selling prices of underlying investments in portfolio. Unlike shares whereby broker commissions and stamp duty are paid by the sub-fund on each transaction, other types of investments (such as collective investment schemes, bonds, money instruments, derivatives) do not have separately identifiable transaction costs; these costs form part of the dealing spread. Dealing spreads vary considerably depending on the transaction value and money market sentiment.

CFP SDL UK Buffettology Fund

Comparative Tables

For the financial year ended 28 February 2024

General Income Shares

	28/02/2024 (pence per share)	28/02/2023 (pence per share)	28/02/2022 (pence per share)
Change in net asset value per share			
Opening net asset value per share	300.44	328.87	349.15
Return before operating charges*	7.22	(21.54)	(13.95)
Operating charges*	(3.38)	(3.51)	(4.37)
Return after operating charges*	3.84	(25.05)	(18.32)
Distributions on income shares	(3.90)	(3.38)	(1.96)
Closing net asset value per share	300.38	300.44	328.87
After transaction costs of**:	0.25	0.05	0.08
Performance			
Total return after operating charges*	1.28%	(7.62)%	(5.25)%
Other Information			
Closing net asset value (£'000)	225,435	329,570	586,865
Closing number of shares	75,049,282	109,693,920	178,447,871
Operating charges*	1.17%	1.15%	1.14%
Direct transaction costs**	0.08%	0.02%	0.02%
Prices			
Highest share price	306.95	337.29	422.56
Lowest share price	263.90	268.61	319.30

* Operating charge, otherwise known as the Ongoing Charge Figure ("OCF") is the ratio of the sub-fund's total disclosable costs (excluding overdraft interest) to the average net assets of the sub-fund. The OCF is intended to provide a reliable figure which gives the most accurate measure of what it costs to invest in a sub-fund and is calculated based on the last year's figures.

** Direct transaction costs are stated after deducting the proportion of the amounts collected from dilution adjustments or dilution levies that relate to direct transaction costs. A negative transaction costs figure might arise where there is a timing difference between inflows and the settlement of the resultant purchases.

CFP SDL UK Buffettology Fund

Comparative Tables (continued)

For the financial year ended 28 February 2024

General Accumulation Shares

	28/02/2024 (pence per share)	28/02/2023 (pence per share)	28/02/2022 (pence per share)
Change in net asset value per share			
Opening net asset value per share	122.73	132.84	140.27
Return before operating charges*	3.02	(8.69)	(5.67)
Operating charges*	(1.39)	(1.42)	(1.76)
Return after operating charges*	1.63	(10.11)	(7.43)
Distribution on accumulation unit	(1.60)	(1.37)	(0.79)
Retained distributions on accumulation share	1.60	1.37	0.79
Closing net asset value per share	124.36	122.73	132.84
After transaction costs of**:	0.10	0.02	0.03
Performance			
Total return after operating charges*	1.33%	(7.61)%	(5.30)%
Other Information			
Closing net asset value (£'000)	300,800	478,716	785,897
Closing number of shares	241,872,323	390,042,594	591,593,892
Operating charges*	1.17%	1.15%	1.14%
Direct transaction costs**	0.08%	0.02%	0.02%
Prices			
Highest share price	126.53	136.24	170.11
Lowest share price	108.78	109.05	128.54

* Operating charge, otherwise known as the Ongoing Charge Figure ("OCF") is the ratio of the sub-fund's total disclosable costs (excluding overdraft interest) to the average net assets of the sub-fund. The OCF is intended to provide a reliable figure which gives the most accurate measure of what it costs to invest in a sub-fund and is calculated based on the last year's figures.

** Direct transaction costs are stated after deducting the proportion of the amounts collected from dilution adjustments or dilution levies that relate to direct transaction costs. A negative transaction costs figure might arise where there is a timing difference between inflows and the settlement of the resultant purchases.

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Risk and Reward Indicator (RRI)

The Risk and Reward Indicator demonstrates where the sub-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 sub-fund.

Typically lower rewards / Lower risk ← → Typically higher rewards / Higher risk

1	2	3	4	5	**6**	7

The sub-fund is ranked as a 6 because it has experienced relatively high rises and falls in value historically. The risk number shown is not guaranteed and may change over time.

The lowest risk number does not mean a risk-free investment.

The sub-fund holds equities concentrated by number and location in the UK. Equities, as an asset class, tend to experience higher volatility than many other assets such as bonds or money market instruments. Sub-funds concentrated by number of assets and/or geographic location are more vulnerable to market sentiment impacting on one or more of those assets or location and can carry a higher risk than sub-funds holding more diversified assets.

The indicator may not take fully into account the following risks of investing in this sub-fund:

Liquidity risk: during difficult market conditions, some securities, such as structured investments, corporate bonds, and position in emerging markets, may become more difficult to sell at desired price.

Counterparty risk: arising from securities which require specific entity, usually a large bank, to honour its obligations to the sub-fund.

Operational risk: arising from investments in overseas markets, in particular emerging market countries, which may not have the same level of safekeeping and other controls as UK markets.

Legal or tax risk: arising from a change in legal regulations, tax rules or the application of them.

Investment Objective and Policy

The investment objective of the sub-fund is to seek to achieve an annual compounding rate of return over the long term, defined as 5 – 10 years, which is superior to the median performance of all of the funds forming the official peer group of which the sub-fund is part. 'Peer group' is defined as being the Investment Association sector to which the sub-fund has been allocated (currently being the UK All Companies Sector) or to which it may be allocated in future, as determined by that body. Investments will be made principally in UK equities, applying the methodology of Business Perspective Investing.

Business Perspective Investing identifies companies that exhibit criteria considered essential to the long term success of that business, and are expected to possess strong operating franchises and experienced management teams. Investments are to be made at a valuation deemed to provide shareholder value over the intended long term period of investment, not to be sold for short term profits.

Further information regarding the investment criteria adopted in Business Perspective Investing can be obtained directly from the Investment Adviser or at https://www.sanford-deland.com/70/who-we-are/business-perspective-investing.

The sub-fund may also invest in other transferable securities, money market instruments, units and/or Shares in other collective investment schemes, deposits, warrants, cash and near cash. The Investment Adviser will adopt a focused approach to investing in shares of those companies which it believes have strong operating franchises and experienced management teams and whose shares are undervalued and offer the potential for improved economic growth.

The sub-fund may also invest in derivatives and forward transactions (for hedging purposes). The sub-fund may borrow and may enter into stock lending and underwriting transactions in accordance with COLL.

Performance

The sub-fund's Income Class share price fell by 0.01% from 302.87p on 28 February 2023 to 302.83p on 28 February 2024. The Accumulation Class share price rose by 1.52% from 122.96p to 124.83p over the same period. This compared to falls of 3.37% for the UK stock market and 0.17% for the sub-fund's peer group and benchmark, the IA UK All Companies sector. The share prices of each class recorded highs of 306.95p and 126.53p, respectively, on 22 February 2024 and lows of 263.90p and 108.78p on 25 October 2023.

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In my last Annual Report, I remarked upon the prevailing investor sentiment away from quality growth compounding companies to so-called 'value' stocks. Subsequently, in this year's Interim Report, I expressed cautious optimism that this trend might have run its course. That optimism appears to have been well founded with a notable improvement in performance in the latter six months of the financial year with the Fund posting a 6.0% gain on a total return basis.

FE Trustnet ranked the Fund 59th out of 234 funds in the IA UK All Companies sector over one year, 212th out of 235 over three years. 195th out of 216 over five years and 6th out of 192 over ten years. The damage to the medium-term performance over the three-year and five-year periods was caused by the savage derating that our investee companies suffered in 2022. I reiterate that it was stock market 'action' that caused this. The operating performance of our portfolio companies has been largely satisfactory with a handful of exceptions.

We stand by our commitment to long-term value creation, which is best served by only investing in great companies and then sticking with them irrespective of short-term share price volatility. In this respect, it is pleasing to note that the Fund ranks 4th out of 172 for performance since its inception on 28 March 2011, having achieved compound annual growth in the share price of 9.6% along the way.

Investment Review

The twelve months under review were characterised by inflation proving much stickier than many expected at the start of the year. Latterly, though, it does appear that central banks have got this under control. This has allowed investors to contemplate the peaking of the interest rate cycle and the possibility of interest rate cuts in the near future. Also the much-mooted UK recession has thus far proven brief and mild and may well have passed as written.

The rise in interest rates that has accompanied the fight against inflation matters for two key reasons. Firstly, following 15 years of zero interest rate policy, investors are realising that cash has value once again and, secondly, when one can obtain a risk-free rate of over 4% just by holding gilts, it raises the bar significantly on the required return from equities.

Business attributes – such as enduring franchises, strong balance sheets, proven business models with pricing power and consistently high returns on capital – are integral to our investment process. It is this discipline that ensures our investee businesses are able to clear the higher hurdle rate required from equities over other asset classes. In the 2023 Annual and 2024 Interim Reports, I included a Table setting out the quantum of certain key metrics for the Buffettology portfolio of companies, together with the comparable statistics for the previous year. I have updated and added to this to show the picture 12 months on.

	Gross Margin	Gross Margin 5-year Average	Operating Margin
February-2024	58.9%	57.2%	25.1%
February-2023	56.8%	56.2%	22.5%
February-2022	52.9%	54.2%	16.3%

	Operating Margin 5-year Average	Return on Equity	Return on Equity 5-year Average
February-2024	24.6%	39.4%	47.0%
February-2023	22.4%	27.6%	31.8%
February-2022	19.0%	21.0%	29.4%

	Free Cash Conversion 5-year Average	Median Interest Cover	Price Earning Ratio
February-2024	84.0%	13.0x	23.1x
February-2023	78%	30.5x	21.8x
February-2022	78%	19.5x	23.7x

	Free Cash Flow Yield
February-2024	4.5%
February-2023	4.9%
February-2022	3.8%

Source: Sanford DeLand and Alpha Terminal. Data reflects weighted averages of portfolio constituents as at 29/2/24. All financial data is statutory with no adjustments.

We seek to buy and hold high quality businesses that possess what Warren Buffett terms an economic moat. These businesses have a competitive advantage that allows them to earn outsized profits and keep their competitors at bay. Businesses with moats command better than average profit margins. At the gross level, after direct costs, this stands at a weighted average of 58.9% across the portfolio compared with an estimated 40% for the UK stock market as a whole. At the operating level, i.e. after direct and indirect costs, the sub-fund's weighted average is 25.1%, again comparing very favourably with the wider UK market, which we believe to be around 15%.

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Return on Equity measures the profitability of a business in relation to the amount of equity capital invested in it. Superior businesses tend to enjoy higher returns on equity and the weighted average across our portfolio stands at 39.4%, compared to the estimated UK market average of just 15%. The differential between this return and the cost of capital, which we assume to be 10% over the long term, is what creates economic value within a business. On this measure, one could argue that our businesses are adding six times as much economic value per £1 of incremental capital invested than the average company quoted on the UK stock market (the differential being 29.4% for the sub-fund versus 5.0% for the market).

When we analyse our companies' returns, it is the cash returns that really matter to us. It is only surplus cash that is available to reinvest in the business, make sensible bolt-on acquisitions or pay dividends (our preference is in that order). As cash flow can be inherently volatile from year to year, we judge this measure over a 5-year moving average to smooth out working capital movements and the timing of capital expenditure projects. Ideally, we want this to be as near to 100% as possible, meaning that the cash generated is tracking reported profitability. As at the end of February, 85% of profit after tax was being converted into free cash flow across the portfolio.

Finally, at a time of elevated interest rates, we sleep at night knowing that our investee companies have strong balance sheets. Of those companies that have any form of debt, the median interest cover stands at thirteen times, meaning that interest costs are, in aggregate, very well covered indeed by operating earnings.

What this table shows is that the operating performance of our investee companies, which is the criterion by which we judge the success of our investments, has improved considerably over the last 24 months. Conversely, their share prices have fallen; in some cases substantially. This disconnect can be explained by noting that is the contraction of the valuation multiple accorded by the stock market to these companies that has done the damage. Operating performance is improving year-on-year whilst the sub-fund's valuation is becoming more attractive as a result of both this and the multiple contraction of each constituent's stock market valuation.

It should come as no surprise to anyone that higher quality businesses command higher valuations. We seek to buy wonderful businesses at fair prices rather than fair businesses at wonderful prices. The forecast price earnings ratio across the sub-fund on a weighted average basis stands at 23.1x, materially lower than where it was when the sub-fund's share price peaked in September 2021, when it stood at over 30x.

More importantly to us, the forecast free cash flow yield currently stands at 4.5%, compared with around 3% at peak valuation. We regard the free cash flow yield as our initial investment coupon but, unlike a straight bond, we can reasonably expect this coupon to grow at around 10% per annum over the long run. We say this because that has been the experience with this cohort of companies over many years. Hence our characterisation of equities as bonds with an expanding coupon.

The rotation from 'growth' to 'value' stocks has been seen most spectacularly in sectors such as Banks, Oil & Gas, Mining and Energy, all sectors that you will not find represented in this sub-fund because they do not accord with our investment criteria. Also, UK shares in general remain an out-of-favour investment class and indeed, UK funds have just suffered their worst year on record for outflows. According to AJ Bell, £13.6bn was pulled from UK funds in 2023, up from £12.0bn in 2022. As a consequence of these influences, we have continued to see an attrition in funds under management. In the 2023-2024 financial year, this fell from £816m to £530m.

The need for liquidity to meet redemptions necessitated frequent paring of positions held across the portfolio. Consequently, investment activity was mainly involuntary and as a result, our portfolio turnover ratio ballooned to 55.4%. To try to normalise this, we split out involuntary activity and focus upon decisions taken by us to exit entire positions. On this basis, there was only one investment sold (not counting a takeover that we suffered) and the portfolio turnover figure is a more respectable 1.4%.

Of the 30 companies held in the sub-fund at any point during the period, 16 showed a gain and 14 showed a loss. The top ten share price gainers and losers during the period were:

Best Performers

Dechra Pharmaceuticals	42.10%†
Craneware	41.30%
Relx	37.70%
NEXT PLC	30.30%*
Bioventix	28.10%
Berkshire Hathaway	27.40%
Experian	21.20%
Softcat PLC	20.80%
London Stock Exchange Group	20.20%
Spirax-Sarco Engineering	17.90%*

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Worst Performers

Team17 Group	-47.00%
Liontrust Asset Management	-46.20%
Quartix Holdings	-46.20%
Focusrite	-41.90%
RWS Holdings	-41.00%
Croda International PLC	-29.70%
NCC Group	-25.70%
Spirent Communications	-19.70%*
Diageo	-14.80%
PayPoint PLC	-12.90%**

* These are new holdings added during the year. An average purchase price has been used to calculate the % gain or loss.

** This holding was exited in full during the period. An average sale price has been used to calculate the % loss.

† This holding was taken over during the period. The takeover price has been used to calculate the % gain.

As already mentioned, portfolio activity was mainly to ensure that we had sufficient advance liquidity to meet redemptions so as not to become forced sellers. This was done by top slicing holdings across the portfolio, not cherry picking the more liquid holdings to realise cash. Accordingly, the liquidity profile of the portfolio is little changed over the twelve months. However, I have again been forced to sell down the holding of Games Workshop where the concentration rules deem that no single holding can account for more than 10% of the portfolio's Net Asset Value. This requirement has forced me to "pull up the roses to water the weeds", as Peter Lynch graphically described selling winners.

Importantly, this was the year we got back on the front foot. We made five new purchases during the period, namely Next PLC, International Personal Finance, Spirent Communications, Rightmove and Spirax-Sarco Engineering. We lost Dechra Pharmaceuticals to a 3875p per share cash takeover by private equity in January and I liquidated the sub-fund's investment in PayPoint PLC in the first four months of the period.

The first purchase was to bring Next PLC back into the portfolio. This was a position we exited in April 2020 in response to Lockdown and its potential impact. We were selling other consumer-facing businesses at the time and Next PLC was a consistency call. People who have heard me discuss this subsequently know it is a decision with which I was never comfortable. The key points are that this is an online play, not bricks and mortar, in my opinion run by one of the finest management teams the UK has to offer. The decision to re-enter was made easier by the savage rection to the full-year results announced on 29 March 2023.

Always cautious, management pointed to pressures in the market with the caveat not to expect much progress in 2023-2024. It only reiterated previous guidance, therefore. Next PLC also published its thinking about the group's future. Management stated "the Group has far more ideas and opportunities for long-term growth than it has had for some time. And while the year ahead looks very challenging, we are not facing the kind of long-term structural obstacles that we have overcome in the past eight years". I am, therefore, pleased to report four guidance upgrades during the period of our renewed ownership with a share price performance to match.

The second acquisition is another re-entry, International Personal Finance, where the under-valuation is compelling in my opinion. This was a business that we held for 5½ years before selling in December 2016, when regulatory legislation in its then largest market, Poland, placed the traditional home collected credit business model under severe strain. Since then, the product has been redesigned and the digital channel to market developed by building on the acquisition of a digital loans company, MCB Finance, in 2015. Also, there are now insurance products in the portfolio. In the process, IPF has become a fintech business. Digital and Mexico are progressing well; the problems have all been in Europe, in particular with the tighter regulations in Poland, withdrawal from Slovakia and an aborted attempt to become established in Spain. IPF borrows long to lend short and has never had difficulty getting loan note issues away. The Tier 1 equity-to-receivables ratio is currently north of 50% against the target of 40%. The group has a diversified debt portfolio with bonds denominated in a variety of currencies matched to asset position and cash flow. Lastly, impairment has been falling steadily and the group is in a strong recovery phase.

The third acquisition is Spirent Communications, a business we know well as a result of Calnex Solutions – held in the Free Spirit Fund – being a major supplier to Spirent. It provides high performance testing, emulation and security for network infrastructure suppliers (e.g. Ericsson, Cisco) and operators (e.g. AT&T, Sprint) for developing new products and services. Recent growth drivers have been the 5G rollout as well as next generation Wi-Fi 6, both of which are much more complex technologies requiring a higher degree of knowledge. Alongside this, there is a shift in the way the core Networks/Security division sells products from one-offs to recurring SaaS that could reduce some of the historic cyclicality. The mood music in the industry is one of capex being reined in near term in response to the current economic climate. As a result of this, Spirent had issued a couple of mild profit warnings. Always mindful of a possible third warning, we acquired our shareholding in a measured way over eight months between June and January. Following the sub-fund's year-end, in March, Spirent received an agreed 175p cash bid from the US company, Viavi Solutions, Inc. at a handsome premium of over 30% to our average in-cost in a very short space of time.

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The fourth acquisition is Rightmove, another business that has been on our radar for some time but where we could never get a pricing opportunity. This is the leading UK online portal for realtors to market their property listings. Crucially, the business model is not directly correlated to either house prices or transaction numbers. But it is certainly indirectly exposed as the customer base is made up of estate agents (mainly) and house builders. The buying opportunity was provided by the adverse stock market reaction to the acquisition of the No. 3 player, OnTheMarket by the US company, CoStar. This saw Rightmove shares fall by almost 20% on the news. The key question is could OnTheMarket, as part of CoStar, threaten Rightmove's dominant market position? We think this fear is overdone since the barriers are high because of the existing network effects. Also, other international companies attempting to enter the UK portal market have failed in the past, including Google.

The fifth acquisition is Spirax-Sarco Engineering, once euphemistically known as 'the steam people'. I have known this business for over 25 years and always wanted to own it in the sub-fund. Only recently has the pricing opportunity presented itself. Nowadays, there is much more to Spirax than steam raising plant and controls used to heat buildings. Lest anyone think that climate change policies threaten its franchise, it is worth pointing out that over the last six years, it has used a combination of buy and build to establish a division dedicated to electrical heating solutions. These are a complementary medium to steam and there are synergies in terms of broad industrial and geographical applications. The other business in the group is Watson-Marlow specialising in pumps and fluid path technologies provided to customers in the process and life sciences industries. This is a very stable group of companies offering the usual combinations we like such as demonstrable growth, sustained high margins, 20% plus return on equity, near one-to-one equivalence of earnings to free cash and a moderately geared balance sheet.

Turning to the voluntary disposal, the decision to divest our holding in PayPoint reflected a number of concerns over the business in terms of growth potential and financial metrics. However, the final straw for me was the takeover of Appreciate Group, formerly known as Park Group. We judge management by how sensibly it allocates capital and, despite our efforts to get comfortable with the deal through engagement with management, it had all the hallmarks of a vanity project. Furthermore, we had real concerns the business was becoming over-geared at precisely the wrong point in the cycle, potentially putting the level of dividend – one of the saving graces of sticking with the position – at risk.

Over the twelve-month period, the strongest performers were Dechra Pharmaceuticals (share price up by 42.1%), Craneware (+41.3%), Relx (+37.7%), Berkshire Hathaway (+33.3%) and Next PLC (+30.3% from average purchase price). There were nine other double-digit and two single-digit risers. The worst performers were Team17 Group (share price down by 47.0%), Liontrust Asset Management (-46.2%), Quartix Holdings (-46.2%), Focusrite (-41.9%) and RWS Holdings (-41.0%). There were six other double-digit and three single-digit fallers.

At the year-end, in terms of banding by market capitalisation, there are: five companies above £20bn representing 24.8% of the portfolio; four between £5bn-20bn making up 14.1%; five between £1bn-5bn making up 22.4%; and fourteen under £1bn making up 35.2%. The remaining 3.5% was held in cash.

Outlook

As we go further into 2024, we have the pleasure of a UK General Election to behold. It is my view that a change of government is now baked-in to share prices. In November, we will have the US Presidential Election re-run between Presidents Biden and Trump. It would not surprise me to see Donald Trump become only the second president ever to regain the White House since Grover Cleveland in 1893. Unlike some, this is hardly an outcome that fills me with dread.

Meanwhile, the narrative on interest rates has shifted from higher for longer to the timing of the first cut. This is helpful as it has prompted both a reduction in gilt yields and a re-rating of equities, which started in November. Also, as I said earlier, it appears as though the UK has just gone through one of the shortest and shallowest recessions on record. So for the first time in quite a while, macroeconomic factors no longer constitute a headwind.

Yet UK equity allocation remains at, or near, record lows. A plus is that political parties of all persuasions finally seem to be waking up to this and the importance of the stock market to the wider UK economy. This is helpful since previous actions from Gordon Brown's tax raid on dividends received by pension fund to Jeremy Hunt's hike in Corporation Tax and savage cuts to CGT and dividend allowances have been wholly negative for UK equities.

Thus, valuations remain at multi-year lows. Whilst this has enabled us to purchase those five new holdings in the past year, it has an unwanted side effect. Asset allocators are leaving far too much on the table for private equity and other would-be acquirers. In effect, the UK is on sale. Not surprisingly, we have seen a notable increase in takeover activity with Dechra completed in January at a 47% premium to its undisturbed price before the offer and Spirent currently ongoing at a 61% premium. At the Buffettology Fund level, valuations also remain close to multi-year lows with a PER of 23.1x and a free cash flow yield of 4.5%. This at a time when dividend payments from this cohort of companies are increasing materially year-on-year.

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Against this more confident backdrop, there is one thing you can be sure of. Our investment approach remains constant as the Northern star. We will continue to invest in high quality companies capable of compounding returns over the long-term. Reassuringly, the key quality of business metrics are getting stronger.

Sanford DeLand Asset Management Ltd
19 March 2024

CFP SDL UK Buffettology Fund

Total Purchases and Top Ten Sales during the year were as follows:

Purchases	Cost £'000	Sales	Proceeds £'000
NEXT PLC	14,886	Games Workshop Group	38,264
Spirax-Sarco Engineering	13,040	Berkshire Hathaway	18,662
Spirent Communications	13,001	RELX PLC	16,962
Rightmove	12,951	Rollins	16,481
International Personal Finance	12,837	JET2 PLC	16,206
		London Stock Exchange Group	15,594
		AB Dynamics	15,494
		Bioventix	15,277
		Experian	14,171
		Sofcat PLC	14,102
Total purchases during the year	**66,715**	**Total sales during the year**	**343,603**

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Portfolio of Investments

As at 28 February 2024

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	BASIC MATERIALS 2.84% (4.46%)		
	Chemicals 2.84% (4.46%)		
325,000	Croda International PLC	14,947	2.84
		14,947	**2.84**
	COMMUNICATIONS 2.83% (0.00%)		
	Media 2.83% (0.00%)		
2,650,000	Rightmove	14,882	2.83
		14,882	**2.83**
	CONSUMER DISCRETIONARY 3.18% (0.00%)		
	Retail 3.18% (0.00%)		
200,000	NEXT PLC	16,708	3.18
		16,708	**3.18**
	CONSUMER GOODS 7.38% (9.11%)		
	Beverages 5.67% (7.02%)		
2,443,400	AG Barr	12,828	2.44
565,000	Diageo	16,973	3.23
		29,801	**5.67**
	Household Goods & Home Construction 1.71% (2.09%)		
1,735,000	MJ Gleeson	9,022	1.71
		9,022	**1.71**
		38,823	**7.38**
	CONSUMER SERVICES 22.70% (24.93%)		
	Media 6.08% (4.85%)		
930,000	RELX PLC	31,983	6.08
		31,983	**6.08**

CFP SDL UK Buffettology Fund

Portfolio of Investments

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	Travel & Leisure & Catering 16.62% (20.08%)		
3,120,000	Focusrite*	13,104	2.49
490,000	Games Workshop Group	46,477	8.83
1,990,000	Jet2 PLC*	27,900	5.30
		87,481	**16.62**
		119,464	**22.70**
	FINANCIALS 17.61% (17.27%)		
	Financial Services 11.36% (11.93%)		
915,000	Hargreaves Lansdown	6,897	1.31
11,000,000	International Personal Finance	12,485	2.37
2,420,000	Liontrust Asset Management	15,657	2.98
277,500	London Stock Exchange Group	24,725	4.70
		59,764	**11.36**
	Non-Life Insurance 6.25% (5.34%)		
67	Berkshire Hathaway	32,878	6.25
		32,878	**6.25**
		92,642	**17.61**
	HEALTH CARE 5.79% (8.54%)		
	Pharmaceuticals & Biotechnology 5.79% (8.54%)		
635,000	Bioventix*	30,480	5.79
		30,480	**5.79**
	INDUSTRIALS 21.08% (20.33%)		
	Construction & Materials 2.54% (2.85%)		
6,820,000	James Halstead*	13,367	2.54
		13,367	**2.54**
	Industrial Engineering 4.47% (4.73%)		
1,285,000	AB Dynamics*	23,515	4.47
		23,515	**4.47**

CFP SDL UK Buffettology Fund

Portfolio of Investments

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	Industrial Services 2.92% (0.00%)		
150,000	Spirax-Sarco Engineering	15,390	2.92
		15,390	**2.92**
	Support Services 11.15% (12.75%)		
735,000	Experian	24,997	4.75
780,000	Rollins	26,788	5.09
3,315,000	RWS Holdings*	6,915	1.31
		58,700	**11.15**
		110,972	**21.08**
	TECHNOLOGY 11.22% (13.88%)		
	Software & Computer Services 9.87% (11.21%)		
680,000	Craneware*	14,348	2.73
8,595,000	NCC Group	10,727	2.04
1,530,000	Softcat PLC	22,185	4.22
1,975,000	Team17 Group*	4,641	0.88
		51,901	**9.87**
	Technology Hardware & Equipment 1.35% (2.67%)		
4,600,000	Quartix Holdings*	7,130	1.35
		7,130	**1.35**
		59,031	**11.22**
	TELECOMMUNICATIONS 1.95% (0.00%)		
	Telecommunications Equipment 1.95% (0.00%)		
9,775,000	Spirent Communications	10,274	1.95
		10,274	**1.95**
	Total Value of Investments	**508,223**	**96.58**
	Net Other Assets	18,012	3.42
	Total Net Assets	**526,235**	**100.00**

Figures in brackets represent sector distribution at 28 February 2023.

Securities are admitted to an official stock exchange listing or traded on another regulated market unless otherwise stated.

* AIM listed securities.

CFP SDL UK Buffettology Fund

Statement of Total Return

For the year ended 28 February 2024

	Note	28/02/2024 £'000	28/02/2024 £'000	28/02/2023 £'000	28/02/2023 £'000
Income					
Net capital losses	2		(11,298)		(107,931)
Revenue	3	15,798		23,002	
Expenses	4	(7,186)		(11,644)	
Interest payable and similar charges		–		–	
Net revenue before taxation		8,612		11,358	
Taxation	5	(60)		(83)	
Net revenue after taxation			8,552		11,275
Total return before distributions			**(2,746)**		**(96,656)**
Distributions	6		(8,552)		(11,275)
Change in net assets attributable to shareholders from investment activities			**(11,298)**		**(107,931)**

Statement of Change in Net Assets Attributable to Shareholders

For the year ended 28 February 2024

	28/02/2024 £'000	28/02/2024 £'000	28/02/2023 £'000	28/02/2023 £'000
Opening net assets attributable to shareholders		**808,286**		**1,372,762**
Amounts received on creation of shares	6,042		24,616	
Amounts paid on cancellation of shares	(281,099)		(486,927)	
		(275,057)		(462,311)
Change in net assets attributable to shareholders from investment activities		(11,298)		(107,931)
Retained distribution on accumulation shares		4,304		5,766
Closing net assets attributable to shareholders		**526,235**		**808,286**

CFP SDL UK Buffettology Fund

Balance Sheet

As at 28 February 2024

	Note	28/02/2024 £'000	28/02/2023 £'000
Assets			
Investment assets		508,223	796,299
Debtors	7	886	1,053
Cash and bank balances	8	21,765	20,508
Total assets		**530,874**	**817,860**
Liabilities			
Creditors	9	(3,657)	(7,518)
Distribution payable on income shares		(982)	(2,056)
Total liabilities		**(4,639)**	**(9,574)**
Net assets attributable to shareholders		**526,235**	**808,286**

Summary of Material Portfolio Changes

For the year ended 28 February 2024

	28/02/2024 £'000	28/02/2023 £'000
Total purchases in year	66,715	-
Total sales in year	343,603	339,683

The notes on pages 29 to 35 are an integral part of these Financial Statements.

On behalf of ConBrio Fund Partners Limited

D. W. Tyerman
Director (of the ACD)
22 May 2024

S. E. Noone
Director (of the ACD)
22 May 2024

CFP SDL UK Buffettology Fund

Notes to the Financial Statements

1. Accounting Policies

The accounting, distribution and risk management policies are provided in the Aggregated notes to the Financial Statements section on pages 11 to 13.

2. Net Capital Losses

	28/02/2024 £'000	28/02/2023 £'000
Non-derivative securities	(11,188)	(107,900)
Currency losses	(110)	(31)
Net capital losses on investments	**(11,298)**	**(107,931)**

3. Revenue

	28/02/2024 £'000	28/02/2023 £'000
UK dividends non-taxable	13,920	21,497
Overseas dividends non-taxable	795	1,157
Bank interest	1,083	348
Total revenue	**15,798**	**23,002**

CFP SDL UK Buffettology Fund

4. Expenses

	28/02/2024 £'000	28/02/2023 £'000
Payable to the ACD, associates of the ACD and agents of either of them		
ACD fees	838	1,252
Investment Adviser fees	5,842	9,721
	6,680	**10,973**
Payable to the depositary or associates of the depositary and agents of either of them		
Depositary fees	146	210
Safe Custody fees	37	(8)
	183	**202**
Other expenses:		
Audit fees	12	8
Calastone fees	–	8
EMX fees	–	2
Financial statement fees	1	–
KIID fees	6	5
Legal fees	1	–
Registration fees	303	446
	323	**469**
Total expenses	**7,186**	**11,644**
Total expenses charged to Income	**(7,186)**	**(11,644)**

Irrecoverable VAT is included in the above expenses where relevant.

CFP SDL UK Buffettology Fund

5. Taxation

(a) Analysis of the tax charge in the year

	28/02/2024 £'000	28/02/2023 £'000
Overseas tax	60	83
Total current tax charge (Note 5 (b))	**60**	**83**
Total taxation for the year	**60**	**83**

(b) Factors affecting current tax charge for the year

	28/02/2024 £'000	28/02/2023 £'000
Net revenue before taxation	8,612	11,358
Net revenue for the year multiplied by the standard rate of (20%)	1,722	2,272
Effects of:		
Movement in excess management expenses	1,220	2,259
Overseas tax	60	83
Revenue not subject to taxation	(2,942)	(4,531)
Total tax charge (Note 5 (a))	**60**	**83**

Authorised OEIC's are exempt from tax on capital gains made within the sub-fund.

(c) Deferred Tax

The sub-fund has not recognised a deferred tax asset of £15,158,801 (2023: £13,938,303) arising as a result of having unutilised management expenses. It is unlikely that the sub-fund will obtain relief for these in the future so no deferred tax asset has been recognised.

6. Distributions

	28/02/2024 £'000	28/02/2023 £'000
Interim distribution	2,361	1,987
Final distribution	982	2,056
Interim accumulation	2,995	2,798
Final accumulation	1,309	2,968
Total Distribution	**7,647**	**9,809**
Add: Income deducted on cancellation of shares	913	1,502
Deduct: Income received on creation of shares	(8)	(36)
Net distributions for the year	**8,552**	**11,275**

CFP SDL UK Buffettology Fund

7. Debtors

	28/02/2024 £'000	28/02/2023 £'000
Accrued revenue	356	592
Sales awaiting settlement	530	461
Total debtors	**886**	**1,053**

8. Cash and Bank Balances

	28/02/2024 £'000	28/02/2023 £'000
Sterling	21,765	20,508
Cash and bank balances	**21,765**	**20,508**

9. Creditors

	28/02/2024 £'000	28/02/2023 £'000
Accrued expenses	554	801
Amounts payable for cancellation of shares	3,103	6,717
Total other creditors	**3,657**	**7,518**

10. Related Parties

Authorised Corporate Director ("ACD")

The annual management charge ("AMC") is 0.20% subject to a minimum of £25,000 per annum and is payable monthly. This fee can, and is, reduced at the discretion of the ACD. Amounts paid to the ACD are disclosed within note 4. The amount due to the ACD at the year end was £58,252 (2023: £80,984) and this is included within the accrued expenses. Details of shares created and cancelled by the ACD are shown in the Statement of Change in Net Assets Attributable to Shareholders.

11. Contigent Liabilities and Commitment

There were no contingent liabilities or outstanding commitments at the balance sheet date (2023: £Nil).

12. Financial Instruments

In pursuing the sub-fund's investment objective, the main risks arising from the sub-fund's financial instruments are market price, currency, interest rate, liquidity and counterparty risk.

Market Price Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

At 28 February 2024, if the price of the investments held by the sub-fund increased or decreased by 5%, with all other variables remaining constant, then the net assets attributable to shareholders would increase or decrease by approximately £25,411,154 (2023: £39,814,952).

CFP SDL UK Buffettology Fund

12. Financial Instruments (continued)

Currency Exposure

There was no material direct foreign currency exposure within the sub-fund at the balance sheet date.

Currency exposure as at 28/02/2024

Currency	Portfolio of investments £'000	Net other assets £'000	Total £'000	Total exposure %
US Dollars	59,666	79	59,745	11.35
Sterling	448,557	17,933	466,490	88.65
Total Net Assets	**508,223**	**18,012**	**526,235**	**100.00**

Currency exposure as at 28/02/2023

Currency	Portfolio of investments £'000	Net other assets £'000	Total £'000	Total exposure %
US Dollar	81,560	121	81,681	10.11
Sterling	714,739	11,866	726,605	89.89
Total Net Assets	**796,299**	**11,987**	**808,286**	**100.00**

At 28 February 2024, if the value of Sterling increased or decreased by 1% against all currencies, with all other variables remaining constant, then the net assets attributable to shareholders would increase or decrease by approximately £597,447 (2023: £816,804).

Interest Rate Risk

The only interest-bearing financial assets of the sub-fund are bank balances on which interest is calculated at a variable rate by reference to Sterling bank deposit rates or the international equivalent (2023: same).

Liquidity Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

Counterparty Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

Fair Value of Financial Assets and Financial Liabilities

There is no material difference between the carrying values and the fair values of the financial assets and liabilities of the sub-fund disclosed in the balance sheet where applicable.

Valuation Technique

As at 28/02/2024	Assets £'000	Liabilities £'000
Level 1	508,223	–
Level 2	–	–
Level 3	–	–
Total	**508,223**	**–**

CFP SDL UK Buffettology Fund

12. Financial Instruments (continued)

As at 28/02/2023	Assets £'000	Liabilities £'000
Level 1	796,299	–
Level 2	–	–
Level 3	–	–
Total	**796,299**	**–**

Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.

Level 2: Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.

Level 3: Inputs are unobservable (i.e. for which market data is unavailable for the asset or liability).

Derivatives and Forward Transactions

The sub-fund does not hold any derivatives or forward transactions that could materially impact the value of the sub-fund.

The Investment Adviser does not use derivative instruments to hedge the investment portfolio against risk.

13. Share Classes

The sub-fund currently has two share classes in issue and the Investment Adviser's Fee on the share classes is as follows:

General Shares:

First £1 billion of assets	-	0.95%
Next £500 million	-	0.85%
Balance over £1.5 billion	-	0.75%

The following table shows the shares in issue during the year:

General Income Shares	Income
Opening Shares	109,693,920
Shares Created	93,524
Shares Liquidated	(34,738,162)
Closing Shares	**75,049,282**

General Accumulation Shares	Accumulation
Opening Shares	390,042,594
Shares Created	4,884,180
Shares Liquidated	(153,054,451)
Closing Shares	**241,872,323**

The net asset value, the asset value per share and the number of shares in issue are given in the Comparative Tables on pages 15 and 16. All share classes have the same rights on winding up. The taxation and income are apportioned equally based on the weighted proportion of each share class.

The distribution per share class is given in the distribution tables on page 36.

CFP SDL UK Buffettology Fund

14. Portfolio Transaction Costs

The following tables show portfolio transactions and their associated transaction costs. For more information about the nature of these costs please refer to the additional portfolio transaction cost information on pages 15 and 16.

PORTFOLIO TRANSACTION COSTS	28/02/2024 £'000	28/02/2023 £'000
Analysis of total purchase costs:		
Equities	66,350	–
Purchases in year before transaction costs	66,350	–
Commissions:		
Equities total value paid	33	–
Taxes:		
Equities total value paid	332	–
Total purchase costs	**365**	**–**
Gross purchases total	**66,715**	**–**
Analysis of total sale costs:		
Equities	343,760	339,855
Gross sales in year before transaction costs	343,760	339,855
Commissions:		
Equities total value paid	(156)	(171)
Taxes:		
Equities total value paid	(1)	(1)
Total sales costs	**(157)**	**(172)**
Gross sales total	**343,603**	**339,683**

PORTFOLIO TRANSACTION COSTS	28/02/2024 %	28/02/2023 %
Analysis of total purchase costs:		
Commissions:		
Equities total value paid	0.05	–
Taxes:		
Equities total value paid	0.50	–
Analysis of total sale costs:		
Commissions:		
Equities total value paid	0.05	0.05
Taxes:		
Equities total value paid	–	–
Transaction costs as percentage of average net asset values		
Commissions	0.03	0.02
Taxes	0.05	–

As at the balance sheet date, the average portfolio dealing spread was 0.69% (2023: 2.10%) based on close of business prices. This spread represents the difference between the values determined respectively by reference to the bid and offer prices of investments expressed as a percentage of the value determined by reference to the offer price.

CFP SDL UK Buffettology Fund

Distribution Tables

Interim Dividend Distribution In Pence Per Share

Group 1 Shares purchased prior to 1 March 2023

Group 2 Shares purchased between 1 March 2023 to 31 August 2023

General Income Shares

	Net Income	Equalisation	Distribution Paid 31/10/2023	Distribution Paid 31/10/2022
Group 1	2.5916	–	2.5916	1.5067
Group 2	1.4817	1.1099	2.5916	1.5067

General Accumulation Shares

	Net Income	Equalisation	Distribution Paid 31/10/2023	Distribution Paid 31/10/2022
Group 1	1.0579	–	1.0579	0.6089
Group 2	0.6103	0.4476	1.0579	0.6089

Final Dividend Distribution In Pence Per Share

Group 1 Shares purchased prior to 1 September 2023

Group 2 Shares purchased between 1 September 2023 to 28 February 2024

General Income Shares

	Net Income	Equalisation	Distribution Payable 30/04/2024	Distribution Paid 30/04/2023
Group 1	1.3088	–	1.3088	1.8741
Group 2	0.8132	0.4956	1.3088	1.8741

General Accumulation Shares

	Net Income	Equalisation	Distribution Payable 30/04/2024	Distribution Paid 30/04/2023
Group 1	0.5413	–	0.5413	0.7609
Group 2	0.3635	0.1778	0.5413	0.7609

CFP SDL Free Spirit Fund

Sub-fund information

The Comparative Tables on pages 38 and 39 give the performance of each active share class in the sub-fund.

The 'Total return after operating charges' disclosed in the Comparative Tables are calculated as the return after operating charges per share divided by the opening net asset value per share. It differs from the sub-fund's performance disclosed in the Investment Adviser's report which is calculated based on the latest published price.

Portfolio transaction costs are incurred when investments are bought or sold by a sub-fund in order to achieve the investment objective. These transaction costs affect an investor in different ways depending on whether they are joining, leaving or continuing with their investment in the sub-fund.

In addition, there are indirect portfolio transaction costs arising from the 'dealing spread' – the difference between the buying and selling prices of underlying investments in portfolio. Unlike shares whereby broker commissions and stamp duty are paid by the sub-fund on each transaction, other types of investments (such as collective investment schemes, bonds, money instruments, derivatives) do not have separately identifiable transaction costs; these costs form part of the dealing spread. Dealing spreads vary considerably depending on the transaction value and money market sentiment.

CFP SDL Free Spirit Fund

Comparative Tables

For the financial year ended 28 February 2024

General Income Shares

	28/02/2024 (pence per share)	28/02/2023 (pence per share)	28/02/2022 (pence per share)
Change in net asset value per share			
Opening net asset value per share	151.59	160.38	163.03
Return before operating charges*	6.94	(5.41)	0.31
Operating charges*	(1.71)	(1.69)	(2.04)
Return after operating charges*	5.23	(7.10)	(1.73)
Distributions on income shares	(2.31)	(1.69)	(0.92)
Closing net asset value per share	154.51	151.59	160.38
After transaction costs**:	0.07	0.03	0.29
Performance			
Total return after operating charges*	3.45%	(4.43)%	(1.06)%
Other Information			
Closing net asset value (£'000)	26,599	27,165	27,621
Closing number of shares	17,214,523	17,919,483	17,221,854
Operating charges*	1.15%	1.12%	1.12%
Direct transaction costs**	0.05%	0.02%	0.16%
Prices			
Highest share price	157.90	162.04	196.36
Lowest share price	133.05	133.48	157.38

* Operating charge, otherwise known as the Ongoing Charge Figure ("OCF") is the ratio of the sub-fund's total disclosable costs (excluding overdraft interest) to the average net assets of the sub-fund. The OCF is intended to provide a reliable figure which gives the most accurate measure of what it costs to invest in a sub-fund and is calculated based on the last year's figures.

** Direct transaction costs are stated after deducting the proportion of the amounts collected from dilution adjustments or dilution levies that relate to direct transaction costs. A negative transaction costs figure might arise where there is a timing difference between inflows and the settlement of the resultant purchases.

CFP SDL Free Spirit Fund

Comparative Tables (continued)

For the financial year ended 28 February 2024

General Accumulation Shares

	28/02/2024 (pence per share)	28/02/2023 (pence per share)	28/02/2022 (pence per share)
Change in net asset value per share			
Opening net asset value per share	156.14	163.32	165.19
Return before operating charges*	7.21	(5.45)	0.21
Operating charges*	(1.77)	(1.73)	(2.08)
Return after operating charges*	5.44	(7.18)	(1.87)
Distribution on accumulated shares	(2.38)	(1.72)	(0.92)
Retained distributions on accumulation share	2.38	1.72	0.92
Closing net asset value per share	161.58	156.14	163.32
After transaction costs**:	0.08	0.03	0.30
Performance			
Total return after operating charges*	3.48%	(4.40)%	(1.13)%
Other Information			
Closing net asset value (£'000)	41,469	60,392	79,105
Closing number of shares	25,664,974	38,679,902	48,434,849
Operating charges*	1.15%	1.12%	1.12%
Direct transaction costs**	0.05%	0.02%	0.16%
Prices			
Highest share price	162.62	164.99	199.67
Lowest share price	138.13	136.81	160.02

* Operating charge, otherwise known as the Ongoing Charge Figure ("OCF") is the ratio of the sub-fund's total disclosable costs (excluding overdraft interest) to the average net assets of the sub-fund. The OCF is intended to provide a reliable figure which gives the most accurate measure of what it costs to invest in a sub-fund and is calculated based on the last year's figures.

** Direct transaction costs are stated after deducting the proportion of the amounts collected from dilution adjustments or dilution levies that relate to direct transaction costs. A negative transaction costs figure might arise where there is a timing difference between inflows and the settlement of the resultant purchases.

CFP SDL Free Spirit Fund

Risk and Reward Indicator (RRI)

The Risk and Reward Indicator demonstrates where the sub-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 sub-fund.

Typically lower rewards — Typically higher rewards
Lower risk — Higher risk

1	2	3	4	5	**6**	7

The sub-fund is ranked as a 6 because it has experienced relatively high rises and falls in value historically. The risk number shown is not guaranteed and may change over time.

Please note that even the lowest ranking does not mean a risk-free investment.

The sub-fund holds a concentrated portfolio of UK equities listed on the LSE or quoted on AIM/ISDX. Equities, as an asset class, tend to experience higher volatility than many other assets such as bonds or money market instruments. Sub-funds concentrated by number of assets and/or geographic location are more vulnerable to market sentiment impacting on one or more of those assets or location and can carry a higher risk than sub-funds holding more diversified assets.

Liquidity risk: during difficult market conditions some securities, such as structured investments, corporate bonds and positions in emerging markets, may become more difficult to sell at a desired price.

Counterparty risk: arising from securities which require a specific entity, usually a large bank, to honour its obligations to the sub-fund.

Operational risk: arising from investments in overseas markets, in particular emerging market countries, which may not have the same level of safekeeping and other controls as UK markets.

Legal or tax risk: arising from a change in legal regulations, tax rules or the application of them.

Investment Objective and Policy

The investment objective of the sub-fund is to seek to maximise total returns over the long-term, defined as 5 – 10 years. At least 80% of the sub-fund will be invested within UK equities, with an emphasis on smaller and mid capitalised companies. The sub-fund will have a concentrated portfolio of between 25 and 40 holdings when fully invested. The Investment Adviser will apply the methodology of Business Perspective Investing.

Business Perspective Investing identifies companies that exhibit criteria considered essential to the long term success of that business, and are expected to possess strong operating franchises and experienced management teams. Investments are to be made at a valuation deemed to provide shareholder value over the intended long term period of investment, not to be sold for short term profits.

Further information regarding the investment criteria adopted in Business Perspective Investing can be obtained directly from the Investment Adviser or at https://www.sanford-deland.com/70/who-we-are/business-perspective-investing.

Performance

The 3.8% gain in the value of the Accumulation shares from 156.85p to 162.83p and the 2.5% increase in the Income shares from 153.03p to 156.84p was a satisfactory outcome against the backdrop of a 3.4% fall in the wider UK stock market and a 0.2% increase in the IA UK All Companies index, the sub-fund's benchmark. Overall, this ranks the sub-fund's performance 31st out of 234 of its peers during the past year. Of greater importance, the sub-fund continues to deliver over the long-term and is ranked 8th out of 206 funds since its inception in 2017.

Investment Review

The year under review is best described – to borrow from football terminology – as a game of two halves.

After a modest decline during the first half, we commented in October's fact sheet that we were witnessing actions we believed to be consistent with the capitulation phase of a bear market – the indiscriminate selling of shares in several of our companies seemingly with no regard to price. Selectively, this allowed us to top up a small number of holdings at what now look like bargain basement prices.

A rapid and material recovery took place starting in November that continues to this day. Since the end of October, the Accumulation share prices has increased by 16.4%, the kind of return more akin to the Magnificent Seven in the US than the supposedly moribund UK stock market.

CFP SDL Free Spirit Fund

It is difficult to pin down this shift in sentiment to any one specific event but the pivot in Central Bank narrative from higher for longer to the timing of the first rate cut is undoubtedly helpful. Specifically in the UK, a number of high profile takeovers – often at very material share price premiums – reinforces our belief that the UK is being sold on the cheap. Asset allocators are leaving an awful lot on the table for trade buyers and Private Equity. Unlike in the Buffettology Fund, which has seen two recommended takeover approaches in the past twelve months, we haven't been victims of any takeover activity in Free Spirit since Aveva in 2022. In our view, it is simply a matter of time.

Despite all the positivity you will sense in this report, your Fund continued to see net outflows in common with many other UK-focused equity strategies. During the year as a whole, these totalled a net £20.7m.

Portfolio turnover was historically very high indeed on an absolute basis at 30.9%. This of course includes sales made in order to meet the aforementioned redemptions. On a voluntary basis, which record those sales made purely for investment purposes, turnover was 4.5% which is far more representative of the sub-fund's underlying turnover.

Of all 28 companies held during the year, 17 recorded share price gains (of which 12 were double-digit) and 11 recorded losses (7 double-digit).

The top ten winners and losers in the year were as follows:

Best Performers

Security	Price (p): 28/02/2023	Price (p): 28/02/2024	%Gain/ Loss
Tristel	332.50	475.00	42.90%
Bytes Technology Group	398.50	543.25	36.30%
Bloomsbury Publishing	417.75	564.50	35.10%
Wilmington[1]	278.57	371.00	33.20%
YouGov	890.00	1,132.50	27.20%
Auto Trader Group	594.00	742.60	25.00%
Diploma	2,806.00	3,444.00	22.70%
Tatton Asset Management	464.50	560.00	20.60%
London Stock Exchange Group	7,446.00	8,950.00	20.20%
Fintel	210.50	251.00	19.20%

[1] Wilmington share price performance is based on average buying price.

Worst Performers

Security	Price (p): 28/02/2023	Price (p): 28/02/2024	%Gain/ Loss
SDI Group	186.00	71.50	-61.60%
XP Power	2,335.00	1,043.00	-55.30%
Calnex Solutions	173.50	79.00	-54.50%
Treatt	544.50	401.75	-26.20%
Kainos Group	1,388.00	1,125.00	-18.90%
Morgan Advanced Materials	315.00	264.00	-16.20%
Auction Technology Group PLC[2]	673.43	602.00	-10.60%
Michelmersh Brick	98.00	90.00	-8.20%
Unilever	4,134.00	3,874.75	-6.30%
AJ Bell	322.60	307.50	-4.70%

[2] Auction Technology Group PLC share price performance is based on average buying price.

We welcomed two new companies to the portfolio during the year.

Auction Technology Group PLC (ATG) operates specialist online marketplaces for Arts & Antiques and Industrial & Commercial auctioneers. These marketplaces are used by 3,800 auction houses globally to host live or timed online auctions, which are more cost and time efficient than physical auctions. The typical auctioneer customer is a Small and Medium-sized Enterprises (SME) operating in the mid-market space, although it does also partner with two of the Big 4 auctioneers on their lower priced lots. The key attraction of listing on ATG's marketplaces is access to an established global bidder base from over 170 countries. This provides it with a much-coveted network effect - more bidders result in higher realised prices, which in turn attracts more auction houses and listings, which attracts more bidders and so on. Crucially, ATG's marketplaces all rank #1 in their respective geographies and verticals. ATG charges auction houses fees to list on the marketplaces, but the primary source of income is transactional commission paid by the winning bidder. In addition to the structural shift of the auction industry online, there is also a significant opportunity to grow by providing auction houses with additional value-added services such as marketing and payments technology.

CFP SDL Free Spirit Fund

Wilmington is a business providing Information & Data and Training & Education to customers operating in Governance, Risk and Compliance (GRC) markets. The group has been on a journey in recent years, with a new management team focused on organic growth as opposed to the previous acquisition-led strategy that eventually came unstuck. Disposals have been made of non-strategic assets that don't operate within its well-defined GRC markets or are not evidencing growth. This has resulted in a more focused and higher quality business, evidenced by the incremental returns on capital and expanding operating margins, which should continue with the ongoing shift to digital. Today, renewal rates are 92% and 79% of revenue is repeating in nature. Free cash flow conversion has averaged around 90% and the balance sheet has £28 million of net cash. Trading updates from the company since our purchase have been excellent and the holding is off to a great start.

We completed the exits of three holdings during the period. The reasons for exiting EKF Diagnostics Holdings and QinetiQ are covered in greater detail in the Fund's Interim Report whilst we also exited a de minimis position in Verici DX. Verici DX is a business that we would never have chosen to invest in proactively but we received a small parcel of shares at nil cost from our holding in EKF.

The metrics we use to monitor the quality of the Fund's portfolio are presented below along with current valuation ratios. We present these in the spirit of transparency so the reader can compare our companies to those of the wider market and make a judgement as to how cheap or expensive the Fund is. In an ideal world this would act as a brake on inflows into the Fund when valuations are stretched, as arguably they were three years ago, and encourage inflows when the metrics are firmly in the investor's favour, such as now. This is the first Annual Report in which we have published these numbers but they are so important that they will be presented regularly going forward.

Performance Metrics	**February 2022**	**February 2023**	**February 2024**
Gross margin (GM)	57.80%	56.70%	55.80%
GM 5-year average	55.50%	56.70%	56.70%
Operating margin (OM)	19.60%	22.10%	21.80%
OM 5-year average	19.80%	21.10%	21.20%
Return on average equity (ROAE)	26.50%	28.80%	27.80%
ROAE 5-year average	29.10%	28.90%	38.90%

Performance Metrics	**February 2022**	**February 2023**	**February 2024**
Free cash conversion (5 year moving av.)	87.00%	88.00%	92.00%
Median interest cover	30.60x	34.05x	27.10x
Fund Valuation			
Price to Earnings Ratio (PER)	27.00x	23.10x	23.30x
Free cash flow yield	3.50%	4.50%	4.70%

Source: Sanford DeLand and Alpha Terminal. Data reflects weighted averages of portfolio constituents as at 29/2/24. All financial data is statutory with no adjustments.

We seek to buy and hold high quality businesses that possess what Warren Buffett terms an economic moat. These businesses have a competitive advantage that allows them to earn outsized profits and keep their competitors at bay. A good example in the portfolio is Auto Trader Group which is dominant in the UK new and used car market, serving nearly 14,000 dealership forecourts. Car buyers spend around ten times more minutes on its website that its closest competitor, Ebay/Gumtree Motors. Imagine trying to displace a business as strong as that.

Businesses with moats command better than average profit margins. At a gross level, this stands at a weighted average of 55.8% across the portfolio compared with an estimated 40% for the UK stock market as a whole. At an operating level, i.e. after administrative costs such as staff and sales and marketing have been deducted, the Fund's weighted average is 21.8%, again comparing very favourably with the wider UK market, which we believe to be around 15%.

Return on Equity is important to us as it measures a business's profitability in relation to the amount of equity capital invested in it. Superior businesses tend to enjoy higher Returns on Equity and the weighted average across our portfolio stands at a five-year average of 38.9%, compared to the estimated UK market average of just 15%.

When we analyse our investee companies' returns, it is the cash returns that really matter. It is surplus cash that is available to juice our return either through reinvestment in the business, sensible bolt-on acquisitions or the payment of dividends (our preference is in that order). As cash flow can be inherently volatile from year to year, we judge this over a 5-year moving average to smooth out working capital movements and the timing of capital expenditure projects. Ideally, we want this to be as near to 100% as possible, meaning that the cash generated is tracking reported profitability. As at the end of February, 92% of profit after tax was being converted into free cash flow across the portfolio.

CFP SDL Free Spirit Fund

Finally, in a time of elevated interest rates, we sleep at night knowing that our investee companies have strong balance sheets. Of those companies that have any form of debt, the median interest cover stands at 27 times, meaning that interest costs are in aggregate very well covered indeed by operating earnings.

It should come as no surprise to anyone that higher quality businesses command higher valuations. We seek to buy wonderful businesses at fair prices rather than fair businesses at wonderful prices. The forecast price earnings ratio across the Fund on a weighted average basis stands at just over 23x, materially lower than where it was just over two years ago when it stood at over 30x. More importantly to us, the forecast free cash flow yield stands at 4.7% and growing.

As at 28 February 2024, 4.6% of the portfolio was invested in Mega Caps, being defined as market capitalisations of £20 billion or over; 8.9% in Large Cap (£5 billion to £20 billion); 28.6% Mid Cap (£1 billion to £5 billion); and 53.3% in Small and Micro Cap (less than £1 billion). This was broadly consistent with the composition at the start of the year, although the two new holdings have market caps in aggregate around half of the two companies they replace. The median market cap increased slightly from £673 million at the start of the year to £736 million at the close.

We ended the year with a cash position of £3.3 million, or 4.8% of net assets, and 25 holdings.

Outlook

One of the main challenges of managing an open-ended investment company, or OEIC, is that investors can – and do – invest or withdraw their money at will. It is for that reason we pay constant attention to the sub-fund's liquidity profile which, for the record, has improved slightly since this time last year. Paradoxically, money seems to appear when valuations are stretched and the opportunities for investment are harder to find and evaporate, at times such as now, when valuations are attractive and opportunities abound. This is the other big challenge of managing an OEIC.

Although it attracted plenty of press, you would expect us to be sceptical of the somewhat vague plans to launch a British ISA announced in the recent Budget. It will take some time to materialise (if at all) and there's not much flesh on the bones. The bigger takeaway, however, is that political parties of all persuasions seem to have finally woken up to the importance of the UK stock market to the wider economy. This can only be supportive of arresting the precipitous fall in allocations to UK equities over the past 25 years.

Sanford DeLand Asset Management Ltd
21 March 2024

CFP SDL Free Spirit Fund

Total Purchases and Top Ten Sales during the year were as follows:

Purchases	Cost £'000	Sales	Proceeds £'000
Wilmington	2,381	Fintel	2,739
Auction Technology Group PLC	2,269	Games Workshop Group	1,953
Calnex SOlutions	91	EKF Diagnostics Holdings	1,646
XP Power	55	Diploma	1,644
		Fevertree Drinks	1,589
		Tatton Asset Management	1,551
		Unilever	1,418
		London Stock Exchange Group	1,354
		QinetiQ Group	1,324
		Kainos Group	1,195
Total purchases during the year	**4,796**	**Total sales during the year**	**23,540**

CFP SDL Free Spirit Fund

Portfolio of Investments

As at 28 February 2024

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	BASIC MATERIALS 1.97% (2.51%)		
	Chemicals 1.97% (2.51%)		
335,000	Treatt	1,343	1.97
		1,343	**1.97**
	CONSUMER GOODS 7.62% (9.12%)		
	Beverages 4.20% (4.68%)		
250,000	Fevertree Drinks*	2,855	4.20
		2,855	**4.20**
	Personal Goods 3.42% (4.44%)		
60,000	Unilever	2,328	3.42
		2,328	**3.42**
		5,183	**7.62**
	CONSUMER SERVICES 26.67% (17.97%)		
	Media 24.44% (14.28%)		
575,000	Auto Trader Group	4,264	6.26
1,210,114	Bloomsbury Publishing	6,704	9.85
850,000	Wilmington	3,111	4.57
235,000	YouGov*	2,562	3.76
		16,641	**24.44**
	Travel & Leisure & Catering 2.23% (3.69%)		
16,000	Games Workshop Group	1,518	2.23
		1,518	**2.23**
		18,159	**26.67**
	FINANCIALS 13.08% (12.42%)		
	Financial Services 13.08% (12.42%)		
970,000	AJ Bell	2,986	4.39
9,500	London Stock Exchange Group	846	1.24
925,000	Tatton Asset Management*	5,069	7.45
		8,901	**13.08**

CFP SDL Free Spirit Fund

Portfolio of Investments

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	HEALTH CARE 2.97% (4.00%)		
	Health Care Equipment & Services 2.97% (4.00%)		
430,000	Tristel*	2,021	2.97
		2,021	**2.97**
	INDUSTRIALS 24.38% (31.56%)		
	Aerospace & Defense 0.00% (1.54%)		
	Construction & Materials 3.56% (3.26%)		
2,725,000	Michelmersh Brick*	2,425	3.56
		2,425	**3.56**
	Electronic & Electrical Equipment 6.48% (10.30%)		
1,060,000	Morgan Advanced Materials	2,767	4.07
1,575,000	SDI Group*	1,118	1.64
50,000	XP Power	521	0.77
		4,406	**6.48**
	Industrial Engineering 7.51% (7.95%)		
95,000	Diploma	3,270	4.80
40,000	Intertek Group	1,844	2.71
		5,114	**7.51**
	Industrial Support Services 6.83% (8.51%)		
500,000	Fintel*	1,225	1.80
600,000	Keystone Law Group*	3,420	5.03
		4,645	**6.83**
		16,590	**24.38**
	TECHNOLOGY 18.76% (17.51%)		
	Software & Computer Services 14.97% (11.15%)		
335,000	Auction Technology Group PLC	1,997	2.93
745,000	Bytes Technology Group	4,075	5.99
2,020,000	Dotdigital Group PLC*	1,893	2.78
200,000	Kainos Group	2,228	3.27
		10,193	**14.97**

CFP SDL Free Spirit Fund

Portfolio of Investments

Holding	Investment	Market Value £'000	Total Value of Sub-fund %
	Technology Hardware & Equipment 3.79% (6.36%)		
3,350,000	Calnex Solutions*	2,579	3.79
		2,579	**3.79**
		12,772	**18.76**
	Total Value of Investments	**64,969**	**95.45**
	Net Other Assets	3,099	4.55
	Total Net Assets	**68,068**	**100.00**

Figures in brackets represent sector distribution at 28 February 2023.

Securities are admitted to an official stock exchange listing or traded on another regulated market unless otherwise stated.

* AIM listed securities.

CFP SDL Free Spirit Fund

Statement of Total Return

For the year ended 28 February 2024

	Note	28/02/2024 £'000	28/02/2024 £'000	28/02/2023 £'000	28/02/2023 £'000
Income					
Net capital gains/(losses)	2		451		(6,245)
Revenue	3	2,040		2,079	
Expenses	4	(872)		(1,041)	
Interest payable and similar charges		–		–	
Net revenue before taxation		1,168		1,038	
Taxation	5	–		–	
Net revenue after taxation			1,168		1,038
Total return before distributions			**1,619**		**(5,207)**
Distributions	6		(1,168)		(1,038)
Change in net assets attributable to shareholders from investment activities			**451**		**(6,245)**

Statement of Change in Net Assets Attributable to Shareholders

For the year ended 28 February 2024

	28/02/2024 £'000	28/02/2024 £'000	28/02/2023 £'000	28/02/2023 £'000
Opening net assets attributable to shareholders		**87,557**		**106,726**
Amounts received on creation of shares	3,782		8,267	
Amounts paid on cancellation of shares	(24,418)		(21,900)	
		(20,636)		(13,633)
Change in net assets attributable to shareholders from investment activities		451		(6,245)
Retained distribution on accumulation shares		696		709
Closing net assets attributable to shareholders		**68,068**		**87,557**

CFP SDL Free Spirit Fund

Balance Sheet

As at 28 February 2024

	Notes	28/02/2024 £'000	28/02/2023 £'000
Assets			
Investment assets		64,969	83,262
Debtors	7	399	71
Cash and bank balances	8	3,302	4,688
Total assets		**68,670**	**88,021**
Liabilities			
Creditors	9	(410)	(332)
Distribution payable on income shares		(192)	(132)
Total liabilities		**(602)**	**(464)**
Net assets attributable to shareholders		**68,068**	**87,557**

Summary of Material Portfolio Changes

For the year ended 28 February 2024

	28/02/2024 £'000	28/02/2023 £'000
Total purchases in year	4,796	10,420
Total sales in year	23,540	18,136

The notes on pages 50 to 56 are an integral part of these Financial Statements.

On behalf of ConBrio Fund Partners Limited

D. W. Tyerman
Director (of the ACD)
22 May 2024

S. E. Noone
Director (of the ACD)
22 May 2024

CFP SDL Free Spirit Fund

Notes to the Financial Statements

1. Accounting Policies

The accounting, distribution and risk management policies are provided in the Aggregated notes to the Financial Statements section on pages 11 to 13.

2. Net Capital Gains/(Losses)

	28/02/2024 £'000	28/02/2023 £'000
Non-derivative securities	451	(6,187)
Currency losses	–	(58)
Net capital gains/(losses) on investments	**451**	**(6,245)**

3. Revenue

	28/02/2024 £'000	28/02/2023 £'000
UK dividends non-taxable	1,928	1,960
Overseas dividends non-taxable	–	57
Bank interest	112	62
Total revenue	**2,040**	**2,079**

CFP SDL Free Spirit Fund

4. Expenses

	28/02/2024 £'000	28/02/2023 £'000
Payable to the ACD, associates of the ACD and agents of either of them		
ACD fees	103	114
Investment Adviser fees	682	838
	785	**952**
Payable to the depositary or associates of the depositary and agents of either of them		
Depositary fees	23	28
Safe Custody fees	7	4
	30	**32**
Other expenses:		
Audit fees	12	8
Calastone fees	–	2
Financial statement fees	1	–
KIID fees	5	5
Legal fees	1	–
Registration fees	38	42
	57	**57**
Total expenses	**872**	**1,041**
Total expenses charged to Income	**(872)**	**(1,041)**

Irrecoverable VAT is included in the above expenses where relevant.

CFP SDL Free Spirit Fund

5. Taxation

(a) Analysis of the tax charge in the year

	28/02/2024 £'000	28/02/2023 £'000
Corporation tax	–	–
Total current tax charge (Note 5 (b))	**–**	**–**
Total taxation for the year	**–**	**–**

(b) Factors affecting current tax charge for the year

	28/02/2024 £'000	28/02/2023 £'000
Net revenue before taxation	1,168	1,038
Net revenue for the period multiplied by the standard rate of (20%)	234	208
Effects of:		
Movement in excess management expenses	152	195
Revenue not subject to taxation	(386)	(403)
Total tax charge (Note 5 (a))	**–**	**–**

Authorised OEIC's are exempt from tax on capital gains made within the sub-fund.

(c) Deferred Tax

The sub-fund has not recognised a deferred tax asset of £759,626 (2023: £607,410) arising as a result of having unutilised management expenses. It is unlikely that the sub-fund will obtain relief for these in the future so no deferred tax asset has been recognised.

6. Distributions

	28/02/2024 £'000	28/02/2023 £'000
Interim distribution	213	175
Final distribution	192	132
Interim accumulation	398	419
Final accumulation	298	290
Total Distribution	**1,101**	**1,016**
Add: Income deducted on cancellation of shares	75	36
Deduct: Income received on creation of shares	(8)	(14)
Net distributions for the year	**1,168**	**1,038**

CFP SDL Free Spirit Fund

7. Debtors

	28/02/2024 £'000	28/02/2023 £'000
Accrued revenue	52	70
Amounts receivable for creation of shares	2	–
Overseas withholding tax reclaimable	–	1
Sales awaiting settlement	345	–
Total debtors	**399**	**71**

8. Cash and Bank Balances

	28/02/2024 £'000	28/02/2023 £'000
Sterling	3,302	4,688
Cash and bank balances	**3,302**	**4,688**

9. Creditors

	28/02/2024 £'000	28/02/2023 £'000
Accrued expenses	81	92
Amounts payable for cancellation of shares	329	240
Total other creditors	**410**	**332**

10. Related Parties

Authorised Corporate Director ("ACD")

The annual management charge ("AMC") is 0.20% subject to a minimum of £25,000 per annum and is payable monthly. This fee can, and is, reduced at the discretion of the ACD. Amounts paid to the ACD are disclosed within note 4. The amount due to the ACD at the year end was £7,482 (2023: £8,685) and this is included within the accrued expenses. Details of shares created and cancelled by the ACD are shown in the Statement of Change in Net Assets Attributable to Shareholders.

11. Contigent Liabilities and Commitment

There were no contingent liabilities or outstanding commitments at the balance sheet date (2023: £Nil).

12. Financial Instruments

In pursuing the sub-fund's investment objective, the main risks arising from the sub-fund's financial instruments are market price, currency, interest rate, liquidity and counterparty risk.

Market Price Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

At 28 February 2024, if the price of the investments held by the sub-fund increased or decreased by 5%, with all other variables remaining constant, then the net assets attributable to shareholders would increase or decrease by approximately £3,248,444 (2023: £4,163,080).

CFP SDL Free Spirit Fund

12. Financial Instruments (continued)

Currency Exposure

There was no material direct foreign currency exposure within the sub-fund at the balance sheet date (2023: same).

Interest Rate Risk

The only interest-bearing financial assets of the sub-fund are bank balances on which interest is calculated at a variable rate by reference to Sterling bank deposit rates or the international equivalent (2023: same).

Liquidity Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

Counterparty Risk

Risk management policies surrounding this risk are discussed in note 3 on pages 12 and 13.

Fair Value of Financial Assets and Financial Liabilities

There is no material difference between the carrying values and the fair values of the financial assets and liabilities of the sub-fund disclosed in the balance sheet where applicable.

Valuation Technique

As at 28/02/2024	Assets £'000	Liabilities £'000
Level 1	64,969	–
Level 2	–	–
Level 3	–	–
Total	**64,969**	**–**

As at 28/02/2023	Assets £'000	Liabilities £'000
Level 1	83,262	–
Level 2	–	–
Level 3	–	–
Total	**83,262**	**–**

Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.

Level 2: Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.

Level 3: Inputs are unobservable (i.e. for which market data is unavailable for the asset or liability).

Derivatives and Forward Transactions

The sub-fund does not hold any derivatives or forward transactions that could materially impact the value of the sub-fund.

The Investment Adviser does not use derivative instruments to hedge the investment portfolio against risk.

CFP SDL Free Spirit Fund

13. Share Classes

The sub-fund currently has two types of share classes in issue and the Investment Adviser's Fee on the share classes is as follows:

General Shares:

First £250 million of assets	-	0.90%
Next £250 million	-	0.825%
Balance over £500 million	-	0.75%

The following table shows the shares in issue during the year:

General Income Shares	Income
Opening Shares	17,919,483
Shares Created	1,228,485
Shares Liquidated	(1,933,445)
Closing Shares	**17,214,523**

General Accumulation Shares	Accumulation
Opening Shares	38,679,902
Shares Created	1,265,623
Shares Liquidated	(14,280,551)
Closing Shares	**25,664,974**

The net asset value, the asset value per share and the number of shares in issue are given in the Comparative Tables on pages 38 and 39. All share classes have the same rights on winding up. The taxation and income are apportioned equally based on the weighted proportion of each share class.

The distribution per share class is given in the distribution tables on page 57.

CFP SDL Free Spirit Fund

14. Portfolio Transaction Costs

The following tables show portfolio transactions and their associated transaction costs. For more information about the nature of these costs please refer to the additional portfolio transaction cost information on pages 38 and 39.

PORTFOLIO TRANSACTION COSTS	28/02/2024 £'000	28/02/2023 £'000
Analysis of total purchase costs:		
Equities	4,771	10,413
Purchases in year before transaction costs	4,771	10,413
Commissions:		
Equities total value paid	2	5
Taxes:		
Equities total value paid	23	2
Total purchase costs	**25**	**7**
Gross purchases total	**4,796**	**10,420**
Analysis of total sale costs:		
Equities	23,552	18,145
Gross sales in year before transaction costs	23,552	18,145
Commissions:		
Equities total value paid	(12)	(9)
Total sales costs	**(12)**	**(9)**
Gross sales total	**23,540**	**18,136**

PORTFOLIO TRANSACTION COSTS	28/02/2024 %	28/02/2023 %
Analysis of total purchase costs:		
Commissions:		
Equities total value paid	0.04	0.05
Taxes:		
Equities total value paid	0.48	0.02
Analysis of total sale costs:		
Commissions:		
Equities total value paid	0.05	0.05
Transaction costs as percentage of average net asset values		
Commissions	0.02	0.02
Taxes	0.03	–

As at the balance sheet date, the average portfolio dealing spread was 1.33% (2023: 1.26%) based on close of business prices. This spread represents the difference between the values determined respectively by reference to the bid and offer prices of investments expressed as a percentage of the value determined by reference to the offer price.

CFP SDL Free Spirit Fund

Distribution Tables

Interim Dividend Distribution In Pence Per Share

Group 1 Shares purchased prior to 1 March 2023

Group 2 Shares purchased between 1 March 2023 to 31 August 2023

General Income Shares

	Net Income	Equalisation	Distribution Paid 31/10/2023	Distribution Paid 31/10/2022
Group 1	1.1930	–	1.1930	0.9569
Group 2	0.8634	0.3296	1.1930	0.9569

General Accumulation Shares

	Net Income	Equalisation	Distribution Paid 31/10/2023	Distribution Paid 31/10/2022
Group 1	1.2239	–	1.2239	0.9697
Group 2	0.9402	0.2837	1.2239	0.9697

Final Dividend Distribution In Pence Per Share

Group 1 Shares purchased prior to 1 September 2023

Group 2 Shares purchased between 1 September 2023 to 28 February 2024

General Income Shares

	Net Income	Equalisation	Distribution Payable 30/04/2024	Distribution Paid 30/04/2023
Group 1	1.1178	–	1.1178	0.7351
Group 2	0.4576	0.6602	1.1178	0.7351

General Accumulation Shares

	Net Income	Equalisation	Distribution Payable 30/04/2024	Distribution Paid 30/04/2023
Group 1	1.1609	–	1.1609	0.7507
Group 2	0.7619	0.3990	1.1609	0.7507

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