# Santander Premium Fund

Interim report for the six months ended 30 April 2024 (unaudited)



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\* These items along with each Fund's Investment Objective & Policy, Risk & Reward Indicator, Investment Commentary, Statement of Material Portfolio Changes and Portfolio Statement collectively constitute the Authorised Corporate Director's Report in accordance with the Collective Schemes Sourcebook.

## **Report of the Authorised Corporate Director**

### for the six months ended 30 April 2024

Santander Premium Fund (the "Company") is an open-ended investment company with variable capital incorporated in England and Wales and authorised and regulated by the Financial Conduct Authority (FCA).

The Company is a UK UCITS and structured as an umbrella company under the Regulations. Provision exists for an unlimited number of Funds and each Fund would be a UK UCITS if it were itself an investment company with variable capital in respect of which an authorisation order made by the FCA were in force.

The assets of each Fund are treated as separate from those of every other Fund and are invested in accordance with that Fund's own investment objective and policy. In addition, each Fund may have more than one class allocated to it. Where a new Fund or class is established, an updated prospectus will be prepared as soon as reasonably practical setting out the relevant information concerning the new Fund or class.

The Authorised Corporate Director (ACD) of the Company is Santander Asset Management UK Limited, which is a private company limited by shares, incorporated in Scotland. The ultimate holding company of the ACD is Banco Santander, S.A., which is incorporated in Spain.

The ACD continues to adopt the going concern basis in the preparation of the accounts for the Santander Premium Funds, with the exception of Sterling Bond. The ACD is of the opinion that it is not appropriate to adopt the going concern basis in the preparation of the financial statements for the Sterling Bond Fund due to the merger with the Santander Sterling Bond Portfolio Fund. As such the financial statements for this Fund have been prepared on a basis other than going concern. In applying this basis of preparation, the Fund's assets and liabilities continue to be stated at their fair values which materially equate to their realisable values. Investments have been reclassified as current assets. Merger and termination costs for the Sterling Bond Fund will be borne by the Authorised Corporate Director and therefore no provision has been made in the Fund's financial statements for these costs. There is also no intention to close the other Funds in the Santander Premium Fund range.

The Company has no directors other than the ACD.

The ACD is authorised and regulated by the FCA.

The Funds in which shares are currently available are as follows:

UK Equities Europe Ex UK Equities United States Equities Japan Equities

In the future, the Company may launch other Funds.

Each Fund has a specific portfolio of assets and investments to which its assets and liabilities are attributable and potential investors should view each Fund as a separate investment entity.

The Funds are segregated portfolios of assets and, accordingly, the assets of a Fund belong exclusively to that Fund and shall not be used or made available to discharge (directly or indirectly) the liabilities of, or claims against, any other person or body, including the Company and any other Fund and shall not be available for any such purpose.

## Report of the Authorised Corporate Director (continued)

### for the six months ended 30 April 2024

The assets of each Fund are invested with the aim of achieving the investment objective and policy of that Fund. They must be invested so as to comply with the investment and borrowing powers and restrictions set out in the FCA regulations, the Instrument of Incorporation and the Prospectus.

Investment of the assets of each Fund must comply with the COLL Sourcebook and the investment objective and policy of the relevant Fund.

Shareholders are not liable for the debts of the Company nor to make any further payment to the Company after paying in full for the purchase of shares.

For further information please refer to the latest Prospectus which is available on www.santanderassetmanagement.co.uk.

As at 30 April 2024 there were no Funds with holdings in a second Fund within the Santander Premium Fund.

Financial details and the ACD's review of the individual Funds for the six months ended 30 April 2024 are given in pages 5 to 95 of this report.

Other information required for the ACD's report per COLL 4.5.9R are disclosed elsewhere in this report.

### **Significant Information**

### SPF – Basis of Preparation

The ACD continues to adopt the going concern basis in the preparation of the accounts for the Santander Premium Funds, with the exception of Sterling Bond. The ACD is of the opinion that it is not appropriate to adopt the going concern basis in the preparation of the financial statements for the Sterling Bond sub-fund due to the merger of the sub-fund with the Santander Sterling Bond Portfolio.

### Changes in the period

### Merger of Sterling Bond

The ACD wrote to Shareholders on 11 September 2023 to advise them of the proposed Merger of Sterling Bond Fund ("Merging Fund") with Santander Sterling Bond Portfolio. Santander Asset Management UK Limited (SAM UK) acts as Authorised Corporate Director of both Santander Premium Fund and Santander Managed OEIC, of which the Merging Fund and Santander Sterling Bond Portfolio are sub funds of respectively. The Merger was approved after SAM UK called an extraordinary general meeting ("EGM") of the Shareholders of the Merging Fund to vote on whether the Merger should take place. The Merger was implemented on 2 February 2024 (the "Effective Date") and a notice of successful Merger completion issued on 5 February 2024.

### Changes to Investment Management - UK Equities

The ACD wrote to Shareholders on 12 April 2024 to advise them of the retirement of Aegon Asset Management UK Plc ("Aegon"), one of the Fund's three Sub-Investment Managers on 26 April 2024 (the "Effective Date"). Aegon managed approximately 9.3% of Santander UK Equities Fund ("Aegon Mandate"). When Aegon retires, this Aegon Mandate will be distributed between the two remaining two Sub-Investment Managers, Schroder Investment Management Limited ("Schroders") and BlackRock Investment Management (UK) Limited ("Blackrock"), resulting in each managing approximately 50% of the portfolio of the Fund, in accordance with their current investment mandates.

## Report of the Authorised Corporate Director (continued)

### for the six months ended 30 April 2024

### Changes in the period (continued)

### Changes to Investment Management - UK Equities (continued)

With effect from the Effective Date, minor updates will be made to the investment strategy and process section of the Fund's investment policy to reflect the retirement of Aegon and reallocation of the Aegon Mandate to Schroders and Blackrock. The Investment Objective will not change. The ACD believes that this reallocation, as a result of Aegon retiring, is in the best interests of shareholders, and minimises the impact to the Fund as the risk profile of the Fund remains the same.

### Authorised Corporate Director's Statement

This report has been prepared in accordance with the requirements of the Collective Investment Scheme's Sourcebook as issued and amended by the Financial Conduct Authority.

Josef Dehunt

Dr Jocelyn Dehnert Director For and on behalf of Santander Asset Management UK Limited Authorised Corporate Director of Santander Premium Fund 28 June 2024

### Investment commentary

### **Investment Objective**

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.

The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: FTSE All Share Index TR.

It is expected that average outperformance for the Fund will typically not be greater than 1.05% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling 3 year period, although no level of outperformance is guaranteed.

### **Investment Policy**

The Fund is actively managed and aims to achieve its objectives by investing at least 80% in a wide range of shares (also known as "equities") in companies listed, at the time of purchase, in the UK, which can include Real Estate Investment Trusts (a type of property investment company) and other investment trusts. The majority of the Fund's assets will be invested in the shares of companies domiciled or incorporated in the UK.

The Fund may also invest up to 10% in shares in companies listed, at the time of purchase, in developed markets outside of the UK. The Fund will at all times be invested between 90% and 100% in shares.

The Fund may also invest globally in developed markets up to 10% in cash, cash like and other money market instruments.

The Fund will invest directly, but may gain exposure indirectly to property through investment in Real Estate Investment Trusts.

The Fund may use Derivatives for Efficient Portfolio Management(including hedging), where Derivatives are used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD had appointed three Sub-Investment Managers up to 26 April 2024 to provide investments management services in relation to the Fund. Following this date, only two Sub-Investment Managers provided these services. The proportion of the Fund's assets under the management of each Sub-Investment Manager(each such portion of the Fund a "Mandate") will be determined by the ACD. The ACD has selected each Sub-Investment Manager based on its ability to deliver the outperformance target associated with its Mandate.

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

### Investment commentary (continued)

### Investment Strategy and Process (continued)

The Mandates are actively managed. This means that each Sub-Investment Manager will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change, and it will select investments that it believes will best achieve each Mandate's outperformance target. An assessment will be completed by the relevant Sub-Investment Manager on investment opportunities before investment decisions are made on a Mandate.

Each Sub-Investment Manager will select investments that it believes will best achieve its Mandate's outperformance target. Investments will be selected with the aim of achieving capital growth, but some will also provide income for the Fund.

Although the Sub-Investment Managers may have different investment styles or biases, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole is to meet its investment objectives. Each Sub-Investment Manager will use its discretion to select companies that it believes will increase in value over time and provide capital growth, with the potential for income, for the Fund.

With regard to the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected.

### Strategy up to 26th April 2024

Each Sub-Investment Manager:

- has a target to outperform the Target Benchmark. Although this is calculated on a different basis (i.e. before the deduction
  of the Fund's fees) to the Fund's outperformance target, this is aligned with the investment objectives of the Fund overall;
  and
- is subject to Tracking Error against the Target Benchmark which is commensurate to the outperformance target noted above.

In respect of one Mandate representing approximately 45% of the Fund, as part of its investment process the Sub-Investment Manager will consider a number of factors with a focus on:

- Quality: companies that have, for example, consistent profits and strong cash flow, low debt and actual or potential asset growth;
- Momentum: a company's share price has performed well over a short period and is expected to continue to do so; and
- Value: a company's share price is lower than expected based on the company's characteristics and financial results.

To help inform its investment views and in addition to its own analysis, this Sub-Investment Manager uses external research as well as a third-party screening process which identifies and ranks some of the companies the Fund may invest in based on quality, momentum and value. The Mandate's portfolio will typically consist of shares in companies which predominantly have good quality and momentum characteristics and offer capital growth.

## Investment commentary (continued)

### Investment Strategy and Process (continued)

While this Sub-Investment Manager will favour long term investments and avoid a high turnover of the Mandate's portfolio and associated costs which can negatively impact the Fund's performance, it can change the Mandate's investments, including to hold shorter term investments, where it believes these will provide capital growth.

The companies this Sub-Investment Manager invests in can be of any size, however it will have a bias to investing in medium sized companies (for example those companies in the FTSE 250 Index). This is because this Sub-Investment Manager believes that these companies have good quality and momentum characteristics as well as delivering higher capital growth than other companies.

In respect of another Mandate representing approximately 45% of the Fund, when selecting companies to invest in the Sub-Investment Manager will focus on:

- established companies with a strong competitive position and long-term outlook in their market, and strong financial records. The Sub-Investment Manager will tend to invest in these companies with the aim of holding such investments for a 3 to 5 year period; and
- companies with low market share in an industry, but which the Sub-Investment Manager believes are leading the evolution of that industry and/or offer a unique business proposition.

The Sub-Investment Manager will tend to invest in these companies with the aim of holding such investments for a 1 to 3 year period.

This Sub-Investment Manager will primarily rely on internal research with several inputs to make its investment decisions, alongside a range of valuation tools. The companies this Sub-Investment Manager invests in can be of any size.

The Mandate representing approximately 10% of the Fund is managed by a third Sub-Investment Manager, which can invest in companies of any size but has a bias to investing in medium to small sized companies which offer the potential for growth.

### Strategy post 26th April 2024

Each Sub-Investment Manager:

- manages approximately 50% of the Fund; and
- has a target to outperform the Target Benchmark. Although this is calculated on a different basis (i.e. before the deduction
  of the Fund's fees) to the Fund's outperformance target, this is aligned with the investment objectives of the Fund overall;
  and
- is subject to Tracking Error against the Target Benchmark which is commensurate to the outperformance target noted above.

## Investment commentary (continued)

### Investment Strategy and Process (continued)

One of the Sub-Investment Managers, as part of its investment process, will consider a number of factors with a focus on:

- Quality: companies that have, for example, consistent profits and strong cash flow, low debt and actual or potential asset growth;
- Momentum: a company's share price has performed well over a short period and is expected to continue to do so; and
- Value: a company's share price is lower than expected based on the company's characteristics and financial results.

To help inform its investment views and in addition to its own analysis, this Sub-Investment Manager uses external research as well as a third-party screening process which identifies and ranks some of the companies the Fund may invest in based on quality, momentum and value. The Mandate's portfolio will typically consist of shares in companies which predominantly have good quality and momentum characteristics and offer capital growth.

While this Sub-Investment Manager will favour long term investments and avoid a high turnover of the Mandate's portfolio and associated costs which can negatively impact the Fund's performance, it can change the Mandate's investments, including to hold shorter term investments, where it believes these will provide capital growth.

The companies this Sub-Investment Manager invests in can be of any size, however it will have a bias to investing in medium sized companies (for example those companies in the FTSE 250 Index). This is because this Sub-Investment Manager believes that these companies have good quality and momentum characteristics as well as delivering higher capital growth than other companies.

In respect of the other Sub-Investment Manager, when selecting companies to invest in, it will focus on:

- established companies with a strong competitive position and long-term outlook in their market, and strong financial records. The Sub-Investment Manager will tend to invest in these companies with the aim of holding such investments for a 3 to 5 year period; and
- companies with low market share in an industry, but which the Sub-Investment Manager believes are leading the evolution of that industry and/or offer a unique business proposition.

The Sub-Investment Manager will tend to invest in these companies with the aim of holding such investments for a 1 to 3 year period.

This Sub-Investment Manager will primarily rely on internal research with several inputs to make its investment decisions, alongside a range of valuation tools. The companies this Sub-Investment Manager invests in can be of any size.

On the basis of the outperformance target and Tracking Error applied to each Mandate, it is expected that average outperformance for the Fund will typically not be greater than 1.05% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three year period. The outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

## Investment commentary (continued)

### Investment Strategy and Process (continued)

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of up to 6%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 6% provided this is consistent with the investment strategy of the Fund.

The Sub-Investment Managers are also subject to Tracking Error against the Target Benchmark. This means that although each Sub-Investment Manager has discretion to select investments for its Mandate, the degree to which each Mandate is permitted to deviate from the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. The Sub-Investment Managers do not have to invest in the same assets that make up the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up the Target Benchmark, but some of the Fund's investments will reflect the constituents of the Target Benchmark.

### **Further Information**

The Target Benchmark for the Fund has been selected as it is representative of shares listed in the UK and therefore broadly in line with the investment policy of the Fund.

The Target Benchmark is provided by FTSE International Limited, which as at the date of this Prospectus is included in the public register of administrators and benchmarks established and maintained by the FCA.

In respect of the Fund's objective to outperform the Target Benchmark after the deduction of fees, the term "fees" includes all fees, costs, charges, expenses and liabilities which are deducted from the value of Fund property for the purpose of calculating its NAV.

If the ACD considers that the Fund's Target Benchmark should be amended as a result of changes to, or evolution of, external market conditions and provided there is no material change to the risk profile of the Fund, it may implement this change after providing Shareholders with reasonable notice in advance.

Variable remuneration of the individual employed by the ACD who is responsible for the selection and ongoing oversight of the Sub-Investment Managers is determined by assessing a number of different factors. Insofar as these relate to investment performance, any assessment may be made by comparing Fund performance relative to the Target Benchmark.

The base currency of the Fund is UK Sterling.

### Investment Manager

Santander Asset Management UK Limited

### Sub-Investment Manager

BlackRock Investment Management (UK) Limited

Schroder Investment Management Limited

## Investment commentary (continued)

### **Risk Profile**

The main risk within the portfolio relates to changes in the prices of securities held. Other risks include: counterparty risk, country risk, investment style and management risk, smaller and medium sized companies risk, liquidity risk and stock market risk. The Fund does not borrow in the normal course of business.

### **Risk and Reward Indicator**

Lower Risl	<b>K</b>			Higher Risk		
Typically L	ower Rew	ards		Туріс	ally Highe	er Rewards
1	2	3	4	5	6	7

The risk and reward indicator shown above is based on historical data which may not be a reliable indication for the future risk profile of the Fund.

The lowest risk and reward indicator does not mean risk free.

The risk and reward indicator shown is not guaranteed and may change over time.

### Performance

	Cumi	Cumulative	
UK Equities Sterling Accumulation A Shares	20.	20.80%	
Percentage price change from 30 April 2021 to 30 April 2024 (3 years	)		
	Annualised	Cumulative	
UK Equities Sterling Accumulation A Shares	2.50%	7.69%	
FTSE All Share Index TR	7.38%	23.80%	
Percentage price change from 31 October 2023 to 30 April 2024 (6 m	onths)		
	Cumi	ulative	
UK Equities Sterling Accumulation A Shares	15.	15.87%	
FTSE All Share Index TR	14	14.21%	

Source Lipper - NAV at noon, bid to bid, net of fees, revenue reinvested.

Source Factset - Market index returns are based on daily index valuations as at close-of-business of the relevant market and are not subject to fees. Past performance is not a guarantee of future performance. The value of investments and the revenue from them can go down as well as up and investors may not get back the amount originally invested.

## Investment commentary (continued)

### **Market Review**

UK shares, as represented by the FTSE All-Share Index (the Target Benchmark), performed well over the six months under review, helped by signs of easing inflation, expectations of early interest-rate cuts by the Bank of England (BoE) and attractive market prices for investors. The FTSE 100 Index, which consists of the 100 largest companies on the UK stock market, rose steadily over the period and reached a succession of record highs in April.<sup>16</sup> The substantial exposure to mining and energy companies was the main driving force, with these sectors benefiting from the strength in the prices of oil, copper and precious metals.

The shares of smaller and mid-sized companies outperformed larger companies over the six months, driven largely by expectations of lower interest rates, reflecting the gradual easing of inflationary pressures. However, the market's early enthusiasm for interest-rate cuts has recently been tempered somewhat.

Overall, on the FTSE-All Share Index, the shares of companies in the industrials, financials and technology sectors performed the best over the six months. On the other hand, the shares of companies in the telecommunications, consumer staples and utilities sectors were the weakest, but still gained over the period.

Over the six months, the BoE maintained its base interest rate at 5.25%, the highest level since 2008. Policymakers hinted that interest rates may be cut if inflation continues its downward trend.<sup>17</sup> The annual rise in consumer prices fell from 3.4% in February to 3.2% in March, although this was slightly higher than the 3.1% rise that investors had forecasted.<sup>18</sup>

Elsewhere, global interest rates have remained higher than the market had expected, with policymakers faced with a challenging situation of having to balance the risk of an economic downturn with persistent high levels of inflation. Higher interest rates can negatively affect economic growth by making borrowing money more expensive for businesses and consumers.

In the US, the Federal Reserve (Fed) maintained interest rates at 5.25-5.50%<sup>19</sup> as inflation remained high. However, towards the end of the period, investor concerns eased after Fed officials signalled their intention to cut interest rates, while also revising up the central bank's growth and inflation forecasts.

In the eurozone, inflation has eased but remained above the European Central Bank's (ECB) target of 2%.<sup>20</sup> The ECB also held rates steady as policymakers balanced concerns over a looming recession with persistently elevated inflationary pressures.

### Performance Review and Investment Activity (Reporting Period)

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon. The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: FTSE All-Share Index TR.

<sup>18</sup> Financial Times, 17 April 2024

<sup>&</sup>lt;sup>16</sup> Reuters, 29 April 2024

<sup>&</sup>lt;sup>17</sup> Financial Times, 21 March 2024

<sup>&</sup>lt;sup>19</sup> Financial Times, 21 March 2024

<sup>&</sup>lt;sup>20</sup> Financial Times, 3 April 2024

## Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

It is expected that average outperformance for the Fund will typically not be greater than 1.05% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three-year period, although no level of outperformance is guaranteed.

The Fund is actively managed by three separate Sub-Investment Managers. The Fund is at least 90% invested in shares and at least 80% in companies listed in the UK. It may invest up to 10% in shares listed in developed markets and up to 10% in cash/cash-like instruments.

The Fund has produced a cumulative return of 20.80% over the last five years, achieving its objective to provide a combination of capital growth and income over a period of five or more years.

The Fund delivered a positive return over the last five years, benefitting from a strong UK market where both FTSE 100 and FTSE 250 delivered a positive return over the period.

Over the past three years, the Fund cumulatively returned 7.69% (2.50% annualised). The Fund has not met its objective to outperform the Target Benchmark, which cumulatively returned 23.80% (7.38% annualised).

Although the Fund outperformed the benchmark in 2023, the Fund fell behind its benchmark by 12.52% in 2022. While the Fund's approach is flexible in that it invests in companies of all sizes, one of the Sub-Investment Managers has a bias to investing in medium sized companies (for example those companies in the FTSE 250 Index). This is because this Sub-Investment Manager believes that these companies have good quality and momentum characteristics as well as delivering higher capital growth than other companies. Given larger sized companies performed better (for example those companies in the FTSE 100 Index) than the medium sized companies, this contributed to the underperformance in 2022.

The Fund delivered a return of 15.87% in the six months through 30 April 2024, while the Target Benchmark returned 14.21%.

In terms of positive individual contributors, the Fund's overweight positions (relative to the Target Benchmark) in Kitwave, ME Group and Ashtead Technology benefited relative performance. An overweight exposure means the Fund held a higher allocation to these shares than the Target Benchmark, while underweight means it held a smaller allocation than the Target benchmark. Not holding the shares of Reckitt Benckiser also aided performance, as it performed poorly over the period

Next was also among the positive contributors over the six months. The firm produced strong financial results that underpinned confidence in the company for the year ahead. The retail segment has proved more resilient than expected as competitors have closed stores. Intermediate Capital Group and IntegraFin, the operator of the UK investment platform Transact, were further positive contributors.

On the other hand, the Fund's overweight holdings in Bytes Technology Group and OSB Group held performance back. The veterinary services company CVS Group was another detractor. The company's shares fell in response to an announcement from the Competition and Markets Authority (CMA), the UK's business competition regulator, that it would be conducting a full market investigation into the veterinary market in the UK. The Sub-Investment Manager feels that the market is functioning

## Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

reasonably well and there was limited evidence of overcharging or anti-competitive practices, so was surprised by the CMA's decision. Nevertheless, the Sub-Investment Manager reduced the Fund's position in CVS Group as the outcome of this investigation is unclear.

The underweight position in Shell and not holding AstraZeneca also weighed on the Fund's relative performance, as both companies witnessed growth in their share prices over the six months. Elsewhere, the Fund's holding in Watches of Switzerland detracted from performance over the period as the company announced a profit warning in early January, driven by a slowdown in sales. This was a disappointing development, and the Sub-Investment Manager closed the position as a result.

The main activity within the Fund over the six months included adding new positions in Unite Group, Softcat, Clarkson, Glencore and SigmaRoc, while also adding to the existing holdings in Shaftesbury Capital and Smurfit Kappa.

Meanwhile, the Sub-Investment Managers sold the Fund's holdings in Anglo American, Burberry and RS Group, and reduced the positions in Melrose Industries and QinetiQ.

### Market Outlook

The Sub-Investment Manager remains optimistic as data continues to indicate that economies are unlikely to fall into a prolonged recession (defined as two consecutive quarters of negative GDP growth). Meanwhile, an end to interest-rate rises and a continued moderation in inflation is likely, according to the Sub-Investment Manager.

Meanwhile, the Sub-Investment Manager believes the UK stock market is undervalued compared to its developed market peers, even when noting the differences in the types of companies that dominate the different markets.

Private equity companies, activist investors and overseas companies are also becoming increasingly active within the UK stock market, drawn by attractive valuations. Many UK companies are also becoming more pro-active by buying back their own shares, which benefits share prices, or returning excess cash to shareholders via increased dividends.

The Sub-Investment Manager remains focused on analysing individual companies to identify high-quality businesses operated by entrepreneurial management teams, with strong market positions and resilient cash-flows. These are the types of businesses that the Sub-Investment Manager believes will be best placed to manage and thrive in the current market environment.

Robert McElvanney Head of UK Front Office For and on behalf of Santander Asset Management UK Limited June 2024

### **UK Equities**

## Summary of material portfolio changes (unaudited)

for the six months ended 30 April 2024

Purchases	Cost £	Sales	Proceeds £
	_		_
Glencore	1,960,344	RELX	2,315,138
Smurfit Kappa	1,553,697	Ashtead	2,167,519
Softcat	1,514,975	Shell	2,166,081
Weir	1,436,697	QinetiQ	1,811,546
XPS Pensions	1,324,983	Reckitt Benckiser	1,716,952
Brooks Macdonald	1,279,006	International Personal Finance	1,214,047
Clarkson	1,092,747	Chemring	1,189,735
CRH	986,372	Whitbread	1,157,973
Informa	963,598	RS	1,136,480
Barclays	960,055	Watches of Switzerland	1,121,153
Unilever	888,383	YouGov	1,028,662
Drax	826,991	Diploma	1,015,614
Intertek	748,094	Bunzl	991,789
UNITE	657,709	Зі	966,251
Shaftesbury Capital	656,456	Standard Chartered	924,416
Alpha International	626,912	Anglo American	913,635
RS	568,570	City Pub	889,252
IG	565,989	Games Workshop	887,991
Зі	559,653	Roche	864,234
Microsoft	539,878	Unilever	850,022

Total cost of purchases for the period

36,245,302 Total proceeds from sales for the period

46,825,463

## Portfolio statement (unaudited)

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Equities 98.02% (97.71%)			
Advertising nil (0.09%)			
Aerospace & Defence 1.27% (0.74%)			
BAE Systems	25,255	336,649	0.16
Melrose Industries	187,467	1,184,417	0.58
QinetiQ	312,223	1,072,798	0.53
		2,593,864	1.27
Apparel nil (0.59%)			
Banks 8.83% (7.14%)			
Bank of Georgia	16,952	910,322	0.45
Barclays	495,467	1,004,312	0.49
DNB Bank	108,051	1,511,699	0.74
HSBC	1,379,960	9,597,622	4.70
NatWest	637,862	1,935,911	0.95
Standard Chartered	395,491	2,727,306	1.33
TBC Bank	10,219	353,577	0.17
		18,040,749	8.83
Beverages 0.55% (1.03%)			
Diageo	11,968	332,112	0.16
Pernod Ricard	6,539	792,598	0.39
		1,124,710	0.55
Building Materials 0.81% (nil)			
CRH	16,798	1,047,523	0.51
SigmaRoc	919,842	599,737	0.30
	_	1,647,260	0.81
Chemicals 0.08% (0.03%)			
Johnson Matthey	5,501	96,597	0.05
Synthomer	28,861	75,039	0.03
		171,636	0.08
Commercial Services 7.83% (10.14%)			
4imprint	32,298	2,028,314	0.99
Ashtead	61,132	3,571,331	1.75
Babcock International	32,225	163,542	0.08
Capita	1,661,890	223,358	0.11

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Commercial Services (continued)			
Experian	14,795	479,950	0.24
Intertek	15,082	745,352	0.37
Pagegroup	28,841	128,689	0.06
RELX	197,619	6,527,356	3.19
Rentokil Initial	59,878	243,704	0.12
XPS Pensions	512,656	1,353,412	0.66
YouGov	61,616	536,059	0.26
	_	16,001,067	7.83
Computers 2.04% (1.62%)			
Bytes Technology	321,080	1,567,513	0.77
Computacenter	45,248	1,168,303	0.57
GB	34,531	99,311	0.05
Softcat	85,044	1,334,340	0.65
	_	4,169,467	2.04
Cosmetics & Personal Care 3.62% (3.21%)			
Unilever	178,808	7,399,075	3.62
	_	7,399,075	3.62
Distribution & Wholesale 0.42% (0.61%)			
Ferguson	1,763	299,005	0.15
RS	75,738	558,189	0.27
	_	857,194	0.42
Diversified Financial Services 6.77% (6.15%)			
Alpha International	47,230	1,001,276	0.49
Ashmore	350,066	676,327	0.33
Brooks Macdonald	63,074	1,198,406	0.59
Hargreaves Lansdown	93,055	757,282	0.37
IG	79,299	593,157	0.29
IntegraFin	562,908	1,688,724	0.83
London Stock Exchange	56,248	4,974,573	2.43
Mastercard	1,960	705,954	0.34
OSB	456,481	1,874,311	0.92
Sosandar	3,204,115	368,473	0.18
		13,838,483	6.77
Electricity 1.02% (0.75%)			
Drax	157,142	813,996	0.40

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Electricity (continued)			
National Grid	18,918	198,166	0.09
SSE	64,826	1,080,325	0.53
	· _	2,092,487	1.02
Electronics 1.23% (1.49%)			
DiscoverlE	22,628	159,528	0.08
Luceco	811,931	1,341,310	0.66
Oxford Instruments	44,537	1,006,536	0.49
	_	2,507,374	1.23
Engineering & Construction 0.91% (0.76%)			
Balfour Beatty	109,993	400,154	0.20
Renew	153,551	1,451,057	0.71
		1,851,211	0.91
Entertainment 0.06% (nil)			
Flutter Entertainment	756	112,833	0.06
		112,833	0.06
Food & Beverages 2.74% (2.19%)			
Cranswick	66,857	2,881,537	1.41
Greggs	6,534	177,986	0.09
Hilton Food	23,879	218,732	0.11
Kitwave	554,303	2,134,066	1.04
Tesco	62,926	186,324	0.09
		5,598,645	2.74
Food Services 1.70% (1.75%)			
Compass	155,833	3,476,634	1.70
		3,476,634	1.70
Forestry & Paper 1.05% (0.12%)			
Smurfit Kappa	61,428	2,142,609	1.05
		2,142,609	1.05
Healthcare Products 0.46% (0.44%)			
Thermo Fisher Scientific	2,090	948,800	0.46
		948,800	0.46

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Healthcare Services nil (nil)			
NMC Health*	2,016	-	-
		-	-
Home Builders 1.56% (1.51%)			
Bellway	53,462	1,352,589	0.66
Berkeley	18,343	864,322	0.42
Persimmon	9,285	121,076	0.06
Taylor Wimpey	640,883	845,325	0.42
		3,183,312	1.56
Home Furnishings 1.15% (1.11%)			
Howden Joinery	268,986	2,356,317	1.15
		2,356,317	1.15
Household Goods 0.13% (1.08%)			
Reckitt Benckiser	5,914	264,178	0.13
		264,178	0.13
Insurance 1.64% (1.84%)			
Legal & General	1,250,532	2,951,255	1.45
Phoenix	80,727	395,401	0.19
		3,346,656	1.64
Internet 3.05% (3.80%)			
Alphabet	9,389	1,220,124	0.60
Auction Technology	148,203	739,533	0.36
Baltic Classifieds	820,870	1,908,523	0.93
Future	72,136	478,261	0.23
Rightmove	338,173	1,741,591	0.85
Trustpilot	80,314	152,757	0.08
		6,240,789	3.05
Investment Companies nil (nil)			
Lodging 0.54% (1.06%)			
InterContinental Hotels	10,713	841,185	0.41
Whitbread	7,996	253,153	0.13
		1,094,338	0.54

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
		_	
Machinery Construction & Mining 0.68% (nil) Weir	68,383	1,399,116	0.68
weit			
		1,399,116	0.68
Machinery Diversified 1.80% (1.86%)			
IMI	102,325	1,792,734	0.88
Rotork	584,978	1,887,139	0.92
		3,679,873	1.80
Media 1.16% (0.44%)			
Bloomsbury Publishing	271,501	1,449,815	0.71
Informa	116,688	928,137	0.45
		2,377,952	1.16
Mining 6.71% (6.57%)			
Anglo American	69,616	1,833,685	0.90
ВНР	54,166	1,204,110	0.59
Glencore	552,251	2,582,602	1.26
Rio Tinto	147,798	8,084,551	3.96
		13,704,948	6.71
Miscellaneous Manufacturing 1.88% (2.74%)			
Chemring	64,083	240,311	0.12
Hill & Smith	83,077	1,570,155	0.77
ME International	1,270,844	2,030,809	0.99
		3,841,275	1.88
Oil & Gas 9.03% (10.61%)			
Aker BP	114,102	2,238,190	1.09
BP	481,793	2,507,251	1.23
Harbour Energy	252,604	729,773	0.36
Marathon Petroleum	10,511	1,525,927	0.75
Serica Energy	517,269	962,120	0.47
Shell	366,075	10,480,727	5.13
		18,443,988	9.03
Oil & Gas Services 0.90% (0.57%)			
Ashtead Technology	225,180	1,839,721	0.90
		1,839,721	0.90

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Pharmaceuticals & Biotechnology 6.83% (7.14%)			
AstraZeneca	61,966	7,473,100	3.66
CVS	80,477	787,065	0.38
GSK	231,696	3,875,116	1.90
Indivior	43,391	625,264	0.30
Novo Nordisk	11,592	1,200,449	0.59
		13,960,994	6.83
Private Equity 3.71% (3.05%)			
3i	188,341	5,416,687	2.65
Intermediate Capital	103,333	2,167,927	1.06
		7,584,614	3.71
Real Estate 0.94% (0.89%)			
Grainger	403,382	1,034,675	0.50
Harworth	666,415	892,996	0.44
Intu Properties**	15,267	0	-
		1,927,671	0.94
Real Estate Investment Trusts 1.36% (0.52%)			
LondonMetric Property	113,925	223,862	0.11
Shaftesbury Capital	497,557	670,209	0.33
Unite	61,788	573,393	0.28
Urban Logistics REIT	137,043	158,422	0.07
Workspace	233,202	1,160,180	0.57
		2,786,066	1.36
Retailers 8.28% (9.27%)			
Associated British Foods	104,314	2,770,580	1.36
B&M European Value Retail	323,872	1,680,896	0.82
Dunelm	144,408	1,465,741	0.72
Grafton	140,855	1,333,333	0.65
Joules***	312,262	-	-
Next	72,191	6,502,965	3.18
Vertu Motors	653,899	460,345	0.22
Watches of Switzerland WH Smith	317,968 148 927	1,076,640 1,633,729	0.53
wit Stiller	148,927	1,633,729	0.80
		16,924,229	8.28

as at 30 April 2024

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Tech - Software & Services 1.64% (1.44%)			
Microsoft	10,791	3,354,117	1.64
		3,354,117	1.64
Telecommunications 2.14% (1.95%)			
Gamma Communications	333,925_	4,367,739	2.14
		4,367,739	2.14
Toys, Games & Hobbies 0.81% (1.34%)			
Games Workshop	16,800_	1,663,200	0.81
		1,663,200	0.81
Transportation 0.69% (0.07%)			
Clarkson	36,230_	1,405,724	0.69
		1,405,724	0.69
Travel & Leisure nil (nil)			
Patisserie****	267,002_	-	-
		-	-
Total Equities	-	200,320,915	98.02
	-		
Collective Investment Schemes 0.05% (nil) Scottish Mortgage Investment Trust	11,379	95,720	0.05
		95,720	0.05

Futures nil (-0.03%)

as at 30 April 2024

Portfolio of investments	200,416,635	98.07
Net other assets	3,945,609	1.93
Total net assets	204,362,244	100.00

Figures in brackets represent sector distribution at 31 October 2023.

All equity shares are listed ordinary shares unless otherwise stated.

Collective Investment Scheme securities are not listed and are valued using publicly available market data unless otherwise stated.

Futures securites are derivative instruments listed on recognised exchanges.

\* NMC Health shares were suspended on 27 February 2020 following liquidation and are priced at zero.

\*\* Intu Properties shares were suspended on 02 July 2020 following liquidation and are priced at zero.

\*\*\* Joules shares were suspended on 16 November 2022 and have been priced at zero since 21 November 2022.

\*\*\*\* Patisserie Holdings shares were suspended on 10 October 2018 following a fraud investigation and are priced at zero.

## Statistical information (unaudited)

for the six months ended 30 April 2024

	Sterling Accumulation A Shares			
	30.04.2024	31.10.2023	31.10.2022	31.10.2021
Other information				
Closing net asset value (£)	204,362,244	189,709,340	201,892,128	272,621,998
Closing number of shares	52,057,000	55,801,156	62,269,844	70,749,217
Net asset value per shares(p)	392.57	339.97	324.22	385.34
Prices				
Highest share price (p)	393.8	374.8	398.2	398.1
Lowest share price (p)	340.2	336.3	311.1	289.0

### Ongoing Charges Figure (OCF)

The OCF provides investors with a clearer picture of the total annual costs in running a Collective Investment Scheme. The OCF consists principally of the ACD's periodic charge, but also includes the costs for other services paid in respect of Depositary, custody, FCA, taxation services, audit fees and transaction charges. Collectively these fees are known as other expenses.

Expense Type	Period to 30.04.2024	Year to 31.10.2023
Sterling Accumulation A Shares		
ACD's periodic charge	0.65%	0.65%
Other expenses	0.06%	0.03%
Ongoing charges figure*	0.71%	0.68%

\*The current period OCF is annualised based on the fees suffered during the accounting period.

## Financial Statements - UK Equities (unaudited)

## Statement of total return (unaudited)

### for the six months ended 30 April 2024

	2024		2023	
	£	£	£	£
Income Net capital gains Revenue Expenses Interest payable and similar charges	3,756,732 (682,067) (2,304)	25,455,149	3,791,809 (712,549) (211)	19,165,433
Net revenue before taxation Taxation	3,072,361 (80,442)	-	3,079,049 (85,640)	
Net revenue after taxation		2,991,919		2,993,409
Total return before distributions		28,447,068	-	22,158,842
Distributions		(2,991,919)		(2,993,409)
Change in net assets attributable to shareholders from investment activities		25,455,149	=	19,165,433

## Statement of change in net assets attributable to shareholders (unaudited)

### for the six months ended 30 April 2024

	2024		2023	
	£	£	£	£
Opening net assets attributable to shareholders		189,709,340*		201,892,128
Amounts receivable on issue of shares Amounts payable on cancellation of shares	1,461,520 (15,290,956)		1,881,426 (11,930,565)	
		(13,829,436)		(10,049,139)
Dilution adjustment		35,272		20,219
Change in net assets attributable to shareholders				
from investment activities		25,455,149		19,165,433
Retained distribution on accumulation shares		2,991,919		2,993,409
Closing net assets attributable to shareholders		204,362,244		214,022,050*

\* The net assets at the start of the current period do not equal the net assets at the end of the comparative period as they are not consecutive periods.

## Balance sheet (unaudited)

as at 30 April 2024

	30 April 2024 £	31 October 2023 £
Assets:		
Fixed assets:		
Investments	200,416,635	185,362,153
Current assets:		
Debtors	1,211,508	275,035
Cash and bank balances	22,707,663	21,239,600
Total assets	224,335,806	206,876,788
Liabilities:		
Investment liabilities	-	(48,208)
Creditors		
Bank overdrafts	(19,146,776)	(16,776,191)
Other creditors	(826,786)	(343,049)
Total liabilities	(19,973,562)	(17,167,448)
Net assets attributable to shareholders	204,362,244	189,709,340

### Accounting policies

The interim financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014.

The accounting policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

The distribution policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

## Distribution tables (unaudited)

### for the six months ended 30 April 2024

Distributions on Sterling Accumulation A Shares in pence per share

Payment	Payment	Distribution	Distribution
date	type	payable	paid
		2024	2023
30.06.24	interim	5.7474	5.0387

### Accumulation distributions

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

### Investment commentary

### **Investment Objective**

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.

The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: MSCI Europe Ex UK Index.

It is expected that average outperformance for the Fund will typically not be greater than 0.65% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling 3 year period, although no level of outperformance is guaranteed.

### **Investment Policy**

The Fund is actively managed and aims to achieve its objectives by investing at least 90% in shares (also known as "equities"). Of the Fund's direct investments:

- at least 90% will be in shares in companies listed, at the time of purchase, in Europe excluding the UK; and
- a maximum of 10% will be in shares in companies listed, at the time of purchase, in other countries.

The Fund can invest in shares of any size of company. However as a result of its investment strategy and process, it will favour large sized companies. The ACD assesses large companies to be those which, at the time of purchase, are considered to form the top 80% by market capitalisation of shares listed in developed European markets excluding UK.

The Fund may invest globally (in developed markets only).

The Fund may also invest up to 5% in cash, cash like and other money market instruments.

At least 90% of the Fund will be invested directly. Up to 10% of the Fund can invest indirectly in these asset classes, and in any amount, by purchasing units of Actively Managed and/or Passively Managed Collective Investment Schemes. These Collective Investment Schemes may be managed by the ACD or other companies (including within the Santander Group).

The Fund may use Derivatives for Efficient Portfolio Management(including hedging), where Derivatives are used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD has appointed one Sub-Investment Manager to provide investment management services in relation to at least 90% of the Fund. The remainder of the Fund is managed by the ACD. The proportion of the Fund's assets under the management of each of the ACD and Sub-Investment Manager(each such portion of the Fund a "Mandate") is determined by the ACD. The ACD has selected the Sub-Investment Manager based on its ability to deliver the outperformance target associated with its Mandate.

## Investment commentary (continued)

### Investment Strategy and Process (continued)

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

The Fund is actively managed which means that the ACD and, subject to the investment guidelines agreed with the ACD, the Sub-Investment Manager, will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change.

Each of the Sub-Investment Manager and ACD will select investments that it believes will best achieve its Mandate's outperformance target. Investments will be selected with the aim of achieving capital growth, but some will also provide income for the Fund.

An assessment will be completed, by the ACD or the Sub-Investment Manager, on investment opportunities before investment decisions are made on their respective Mandates.

Although the ACD and the Sub-Investment Manager may have a different investment style or bias, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole seeks to meet its investment objectives.

With regard to the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected.

In respect of the Mandate representing at least 90% of the Fund managed by the Sub-Investment Manager, the Sub-Investment Manager:

- has a target to outperform the Target Benchmark. Although this is measured over a different period, and calculated on
  a different basis (i.e. before the deduction of the Fund's fees), to the Fund's outperformance target, this is aligned with
  the investment objectives of the Fund overall; and
- is subject to a tracking error (as described below) which is commensurate to the outperformance target noted above, and will reference the Target Benchmark.

The Sub-Investment Manager will use its discretion to select companies that it believes will increase in value overtime and provide capital growth, with the potential for income, for the Fund.

The Sub-Investment Manager's investment style does not focus on a particular type of company, or sector, but rather how a company's expected return can contribute to the Fund's ability to meet its investment objectives. It will aim to invest in companies with strong and predictable earnings, dominant in their market, and aim to avoid those companies that are viewed as too expensive as well as avoiding short term trends.

## Investment commentary (continued)

### Investment Strategy and Process (continued)

As part of its investment process the Sub-Investment Manager's research tool ranks some of the companies the Fund may invest in, based on a number of factors which focus on:

- Growth: companies whose earnings are expected to increase at an average rate above their industry or the overall market;
- Quality: companies that have, for example, consistent profits and strong cash flow, low debt and actual or potential asset growth;
- Momentum: a company's share price has performed well over a short period and is expected to continue to do so; and
- Value: a company's share price is lower than expected based on the company's characteristics and financial results.

In addition to this input to the investment process, the Sub-Investment Manager's selection of which companies to invest in also considers market and geopolitical environment and company operating and financial conditions by using sector and industry specialists.

As a result of the investment process, the Sub-Investment Manager will favour large sized companies and will tend to invest in between 40-60 companies.

The ACD manages the Mandate representing the remainder of the Fund in line with the Fund's investment objective to outperform the Target Benchmark, and is also subject to the Fund level Tracking Error described below. Typically the ACD will invest its Mandate in Collective Investment Scheme(s) which complement the Mandate managed by the Sub-Investment Manager and which the ACD believes will help the Fund to achieve its outperformance objective.

The Fund's strategy is complemented by the use of Derivatives for Efficient Portfolio Management. It is expected that Derivatives will be used regularly (for example to manage risk or to respond quickly to developments in financial markets).

On the basis of the outperformance target and risk management measures applied to each Mandate, it is expected that average outperformance for the Fund will typically not be greater than 0.65% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling three year period. The outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of between 4-8% with a target of 6%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 8% provided this is consistent with the investment strategy of the Fund.

The tracking error means that although the Sub-Investment Manager and the ACD have discretion to select investments for their respective Mandate, the degree to which each Mandate is permitted to deviate from the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. The Sub-Investment Manager and the ACD do not have to invest in the same assets that make up the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up the Target Benchmark, but some of the Fund's investments will reflect the constituents of the Target Benchmark.

## Investment commentary (continued)

### **Further Information**

The Target Benchmark for the Fund has been selected as it is representative of shares listed in Europe excluding UK and broadly in line with the investment policy of the Fund.

The Target Benchmark is provided by MSCI Limited, which as at the date of this Prospectus is included in the public register of administrators and benchmarks established and maintained by the FCA.

In respect of the Fund's objective to outperform the Target Benchmark after the deduction of fees, the term "fees" includes all fees, costs, charges, expenses and liabilities which are deducted from the value of Fund property for the purpose of calculating its NAV.

If the ACD considers that the Fund's Target Benchmark should be amended as a result of changes to, or evolution of, external market conditions and provided there is no material change to the risk profile of the Fund, it may implement this change after providing Shareholders with reasonable notice in advance.

Variable remuneration of those individuals employed by the ACD who are responsible for: managing a Mandate; and/or the selection and ongoing oversight of the Sub-Investment Manager, is determined by assessing a number of different factors. Insofar as these relate to the investment performance of a Mandate, any assessment may be made by comparing Mandate performance relative to the Target Benchmark and may also include a comparison against a commercial peer group of competitor funds with similar investment objectives and policies.

The base currency of the Fund is UK Sterling.

### **Investment Manager**

Santander Asset Management UK Limited

#### Sub-Investment Manager

Santander Asset Management S.A., SGIIC.

### **Risk Profile**

The main risk within the portfolio relates to changes in the prices of securities held. Other risks include: counterparty risk, country risk, currency risk, derivatives risk, investment style and management risk, liquidity risk and stock market risk. The Fund does not borrow in the normal course of business.

## Investment commentary (continued)

### **Risk and Reward Indicator**

Lower Risk	K				ŀ	ligher Risk
Typically L	Typically Lower Rewards Typically Higher			er Rewards		
1	2	3	4	5	6	7

The risk and reward indicator shown above is based on historical data which may not be a reliable indication for the future risk profile of the Fund.

The lowest risk and reward indicator does not mean risk free.

The risk and reward indicator shown is not guaranteed and may change over time.

### Performance

Percentage price change from 30 April 2019 to 30 April 2024 (5 years)	I		
	Cumu	ılative	
Europe Ex UK Equities Sterling Accumulation A Shares	53.	53.71%	
Percentage price change from 30 April 2021 to 30 April 2024 (3 years)			
	Annualised	Cumulative	
Europe Ex UK Equities Sterling Accumulation A Shares	7.76%	25.16%	
MSCI Europe Ex UK Index*	6.72%	21.54%	
Percentage price change from 31 October 2023 to 30 April 2024 (6 month	is)		
	Cumi	ılative	
Europe Ex UK Equities Sterling Accumulation A Shares	15.	15.44%	
MSCI Europe Ex UK Index*	15.	15.99%	

Source Lipper - NAV at noon, bid to bid, net of fees, revenue reinvested (accumulation class only).

Source Factset- Market index returns are based on daily index valuations as at close-of-business of the relevant market and are not subject to fees. Past performance is not a guarantee of future performance. The value of investments and the revenue from them can go down as well as up and investors may not get back the amount originally invested.

\* Please note that the Benchmark was reclassified from Constraint to Target on 7 July 2021. Prior to this date the Fund was not aiming to outperform the Benchmark. Benchmark prior to 7 July 2021 - FTSE World Europe Ex UK Index.

## Investment commentary (continued)

### **Market Review**

While 2023 was not the year most investors expected, it turned out to be positive for European stock market investors; almost all indices ended the year close to double-digit returns.

One feature of financial markets in 2023 was the disconnect between how the economy and stock markets behaved. This was especially true for Germany, which experienced a recession with a modest 0.4% decline in GDP,<sup>5</sup> yet its share market is among the best performing in Europe so far this year.

The last quarter of 2023 was a solid one for equities as the US Federal Reserve (Fed) signalled potential interest rate cuts in 2024. Developed markets outperformed emerging markets amid ongoing worries over China's real estate sector.

So far in 2024, global stocks have had their best first quarter in five years amid optimism over the outlook for the US economy and hopes that artificial intelligence (AI) will boost corporate profits.

Late in 2023, the rally was propelled by lower government bond yields, resulting from hopes for a pivot by central banks towards lower interest rates. Lower bond yields can benefit share prices as investors seek out a potentially higher return from owning more shares than bonds. However, this year, the rally has been mainly driven by robust results from high-quality companies and encouraging economic data.

The gains came despite greater caution in markets over the likely pace and extent of the Fed's rate cuts this year. Having priced as many as six cuts for 2024 at the peak in January, investors are now expecting around three cuts. This reflected data suggesting that the improvement in inflation stalled in the first two months of the year.

March was a big month for other central banks. The Swiss National Bank kicked off the global rate-cutting cycle, taking investors by surprise as it became the first developed-nation central bank to ease policy since the aftermath of the COVID-19 pandemic. Meanwhile, the Bank of Japan enacted its first rate hike in 17 years, ending an eight-year stretch of negative interest rates.

Over the six-month period ending 30 April 2024, all sectors reported positive returns, but the dispersion among them has been large. Banks, industrials, goods and services, and technology led the pack, while food, beverage and tobacco, utilities and telecommunications lagged.

### Performance Review and Investment Activity (Reporting Period)

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon. The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3-year time period: MSCI Europe Ex UK Index.

It is expected that average outperformance for the Fund will typically not be greater than 0.65% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling 3-year period, although no level of outperformance is guaranteed.

<sup>5</sup> AP News, 11 October 2023

## Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

The Fund is actively managed by a Sub-Investment Manager and at least 90% of its investments are in shares listed in Europe (excluding the UK). Up to 10% of its investments can be in shares of companies listed in other countries.

The Fund has produced a cumulative return of 53.71% over the last five years, achieving its objective to provide a combination of capital growth and income over a period of five or more years.

Over the past three years, the Fund cumulatively returned 25.16% (7.76% annualised). The Fund has met its objective to outperform the Target Benchmark, which cumulatively returned 21.54% (6.72% annualised).

The Fund's capital growth over the five year period and outperformance over the three year period can be attributed to good share selection by the Sub-Investment Manager and by investing more in large company shares than the Target Benchmark, which outperformed over the period.

The Fund delivered a return of 15.44% in the six months through 30 April 2024, while the Target Benchmark returned 15.99%.

Over the period, the Fund underperformed the Target Benchmark, which was mainly due to the positioning within specific sectors and, to a lesser extent, the Sub-Investment Manager's decision to hold the shares of particular companies.

The Sub-Investment Manager's stock selection resulted in a slight tilt towards companies perceived as higher quality and defensive (A stock that provides consistent dividends and stable earnings regardless of the overall state of the stock market) and this had a negative impact on performance, as those stocks and sectors underperformed during the period. On one side, cyclical sectors (those heavily linked to changes in the economy) like semiconductors had a strong rally during the last part of 2023 and early 2024 due to AI-related optimism. On the other side, sectors with a negative correlation with the movement in bond yields, like real estate and utilities, underperformed as yields climbed on central banks' indications that rates could stay "higher for longer" as inflation remains stubbornly high.

During the six-month period ending 30 April 2024, the Sub-Investment Manager's strategy was not changed. The strategy continues to target a flexible investment style, as the investment process is not designed to produce any intended style or sector bias in the portfolio. Rather, it highlights companies with an expected return profile that will back the strategy's capacity to outperform its reference benchmark over a market cycle.

The Sub-Investment Manager continues to be selective in picking companies. In a volatile market, carefully choosing shares should be the main focus, rather than looking at the positioning in particular sectors or investment factors. Therefore, the portfolio construction strategy is based on an exhaustive fundamental analysis to generate positive investment ideas.

Without making structural changes in the portfolio's sector positioning, the Sub-Investment Manager is focused on holding quality companies, such as those that are leaders in their sectors, with positive financial health, strong management teams and low levels of debt. In this sense, the Sub-Investment Manager opened positions in UBS (as investment banking and wealth management are more resilient and predictable, fee-based businesses), Allianz, Symrise, Coca-Cola Europacific Partners (the largest independent Coca-Cola bottler in the world based on revenues), Fresenius and Novartis. The Sub-Investment Manager

## Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

closed positions in Barry Callebout (as cocoa prices continue to rise to record highs), MunichRe, BNP Paribas, Essilor Luxottica, Givaudan, Ahold (as food retailers have enjoyed food inflation during the last two years), Bayer and Kering.

### Market Outlook

As the second quarter kicks off, the Sub-Investment Manager believes the outlook for European equities has undoubtedly improved due to receding inflation, positive economic growth, potentially lower interest rates and rising corporate earnings, which have, until now, created a supportive backdrop for stocks in 2024.

Economic activity in Europe is improving, with stronger momentum in the periphery, particularly Southern Europe. In the US, the latest data suggests a slight cooling, but still shows a robust economic trend. A key trend since the beginning of the year has been a reduction in rate-cut expectations by market participants for 2024. Still, the Sub-Investment Manager feels that the clear bias towards monetary policy easing remains unchanged and a principal driver of share markets going forward as investors are pricing in a 'soft-landing' or 'no-landing' scenario.

The theme of AI is significant across the investment community, especially in the US. The Sub-Investment Manager believes the longer-term potential appears vast, but there are concerns about the vast scale of investment required to build the required data centres and the pace of final demand, as most end-user companies of AI are still in the experimental stage.

The geopolitical situation also remains uncertain, with European Parliament elections in June. Moreover, the US presidential election may impact Europe, in terms of the ongoing support for Ukraine or presidential candidate Donald Trump imposing new trade barriers or tariffs.

Robert McElvanney Head of UK Front Office For and on behalf of Santander Asset Management UK Limited June 2024

## Summary of material portfolio changes (unaudited)

for the six months ended 30 April 2024

Purchases	Cost £	Sales	Proceeds £
UBS	1,856,859	Muenchener Rueckversicherungs	1,850,326
Allianz	1,621,652	BNP Paribas	1,694,264
Symrise	1,373,737	EssilorLuxottica	1,645,645
Fresenius	1,234,572	Givaudan	1,437,683
ASML	1,192,908	Koninklijke Ahold Delhaize	1,033,030
Coca-Cola Europacific Partners	1,089,240	LVMH Moet Hennessy Louis Vuitton	816,041
Novartis	844,044	Roche	776,635
Vonovia	564,523	Bayer	702,895
Danone	485,246	CRH	694,421
Universal Music	376,022	Kering	658,418
Capgemini	296,194	Deutsche Telekom	574,812
Deutsche Post	286,077	Linde	551,171
TotalEnergies	199,650	BlackRock European Dynamic Fund A Acc	546,010
Schneider Electric	176,056	Barry Callebaut	507,797
Industria de Diseno Textil	174,154	Intesa Sanpaolo	440,844
Merck	117,902	Vinci	293,034
Heineken	116,215	Novo Nordisk	290,011
Deutsche Telekom	116,030	TotalEnergies	289,651
		Iberdrola	286,455
		Industria de Diseno Textil	259,587

Total cost of purchases for the period

12,121,081 Total proceeds from sales for the period

17,752,868

All purchases during the period are disclosed above.

## Portfolio statement (unaudited)

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Equities 90.68% (91.12%)			
Denmark 7.67% (6.52%)			
Novo Nordisk	45,584	4,720,607	7.67
France 27.71% (33.10%)			
AXA	55,958	1,549,584	2.52
Capgemini	6,987	1,180,708	1.92
Cie Generale des Etablissements Michelin	44,096	1,357,785	2.21
Danone	28,473	1,426,203	2.32
L'Oreal	5,172	1,941,653	3.15
LVMH Moet Hennessy Louis Vuitton	2,949	1,950,052	3.17
Safran	11,113	1,937,729	3.15
Schneider Electric	12,111	2,223,435	3.61
TotalEnergies	35,179	2,060,394	3.35
Vinci	15,100	1,421,548	2.31
		17,049,091	27.71
Germany 18.41% (16.03%)			
Allianz	7,600	1,726,889	2.80
Deutsche Boerse	8,634	1,336,644	2.17
Deutsche Post	41,416	1,390,907	2.26
Deutsche Telekom	75,154	1,379,738	2.24
Fresenius	43,581	1,037,147	1.69
Merck	9,115	1,157,374	1.88
RWE	30,936	859,583	1.40
Symrise	13,802	1,183,854	1.92
Vonovia	54,314	1,258,716	2.05
		11,330,852	18.41
Italy 2.59% (2.47%)			
Intesa Sanpaolo	529,645	1,594,679	2.59
Netherlands 12.67% (10.54%)			
ASML	4,938	3,510,698	5.70
Heineken	17,966	1,400,339	2.28
ING Groep	119,247	1,512,912	2.46
Universal Music	58,198	1,375,065	2.23
	_	7,799,014	12.67
Norway 1.58% (2.11%)			
Equinor	45,083	971,792	1.58

as at 30 April 2024

Investment	Holding or nominal value of positions at	Market value £	Percentage of total net assets %
Investment	30 April	I	70
Republic of Ireland 4.13% (5.14%)			
CRH	22,656	1,400,451	2.28
Linde	3,235	1,139,197	1.85
		2,539,648	4.13
Spain 4.89% (4.91%)			
Iberdrola	167,596	1,646,479	2.67
Industria de Diseno Textil	37,369	1,367,314	2.22
		3,013,793	4.89
Switzerland 9.15% (10.30%)			
Novartis	17,809	1,380,958	2.24
Roche	7,779	1,494,294	2.43
SGS	16,841	1,188,725	1.93
UBS	74,311	1,570,470	2.55
		5,634,447	9.15
United Kingdom 1.88% (nil)			
Coca-Cola Europacific Partners	20,195	1,157,104	1.88
Total Equities	_	55,811,027	90.68
Collective Investment Schemes 6.74% (6.64%)			
BlackRock European Dynamic Fund A Acc	173,397	1,774,666	2.88
BlackRock European Dynamic Fund FA Acc	812,416	2,374,002	3.86
	_	4,148,668	6.74
Portfolio of investments		59,959,695	97.42
Net other assets		1,586,727	2.58
Total net assets		61,546,422	100.00

Figures in brackets represent sector distribution at 31 October 2023.

All equity shares are listed ordinary shares unless otherwise stated.

Collective Investment Scheme securities are not listed and are valued using publicly available market data unless otherwise stated.

## Statistical information (unaudited)

for the six months ended 30 April 2024

	Sterling Accumulation A Shares			
	30.04.2024	31.10.2023	31.10.2022	31.10.2021
Other information				
Closing net asset value (£)	61,546,422	59,131,104	59,339,470	73,307,337
Closing number of shares	10,751,355	11,837,122	13,126,088	14,751,185
Net asset value per shares(p)	572.45	499.54	452.07	496.96
Prices				
Highest share price (p)	586.1	539.8	520.0	508.3
Lowest share price (p)	500.4	463.8	415.8	363.9

#### Ongoing Charges Figure (OCF)

The OCF provides investors with a clearer picture of the total annual costs in running a Collective Investment Scheme. The OCF consists principally of the ACD's periodic charge, but also includes the costs for other services paid in respect of Depositary, custody, FCA, taxation services, audit fees and transaction charges. Collectively these fees are known as other expenses.

Expense Type	Period to 30.04.2024	Year to 31.10.2023
Sterling Accumulation A Shares		
ACD's periodic charge	0.65%	0.65%
Other expenses	0.13%	0.07%
Ongoing charges figure*	0.78%	0.72%

\*The current period OCF is annualised based on the fees suffered during the accounting period.

## Financial Statements - Europe Ex UK Equities (unaudited)

## Statement of total return (unaudited)

#### for the six months ended 30 April 2024

	2024		2023	
	£	£	£	£
Income Net capital gains Revenue Expenses Interest payable and similar charges	933,400 (231,670) 	7,812,513	844,347 (220,480) (126)	9,160,602
Net revenue before taxation Taxation	701,730 (127,902)		623,741 (95,437)	
Net revenue after taxation		573,828		528,304
Total return before distributions		8,386,341		9,688,906
Distributions		(573,828)		(528,304)
Change in net assets attributable to shareholders from investment activities		7,812,513	=	9,160,602

## Statement of change in net assets attributable to shareholders (unaudited)

#### for the six months ended 30 April 2024

	2024		202	3
	£	£	£	£
Opening net assets attributable to shareholders		59,131,104*		59,339,470
Amounts receivable on issue of shares Amounts payable on cancellation of shares	463,836 (6,451,004)		477,431 (3,492,979)	
		(5,987,168)		(3,015,548)
Dilution adjustment		16,145		7,084
Change in net assets attributable to shareholders				
from investment activities		7,812,513		9,160,602
Retained distribution on accumulation shares		573,828		528,304
Closing net assets attributable to shareholders		61,546,422	-	66,019,912*

\* The net assets at the start of the current period do not equal the net assets at the end of the comparative period as they are not consecutive periods.

## Balance sheet (unaudited)

as at 30 April 2024

	30 April 2024 £	31 October 2023 £
Assets:		
Fixed assets:		
Investments	59,959,695	57,805,083
Current assets:		
Debtors	622,680	391,544
Cash and bank balances	1,050,431	6,034,112
Total assets	61,632,806	64,230,739
Liabilities:		
Creditors		
Bank overdrafts	-	(4,901,327)
Other creditors	(86,384)	(198,308)
Total liabilities	(86,384)	(5,099,635)
Net assets attributable to shareholders	61,546,422	59,131,104

#### Accounting policies

The interim financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014.

The accounting policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

The distribution policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

# Distribution tables (unaudited)

#### for the six months ended 30 April 2024

Distributions on Sterling Accumulation A Shares in pence per share

Payment	Payment	Distribution	Distribution
date	type	payable	paid
		2024	2023
30.06.24	interim	5.3373	4.2220

#### Accumulation distributions

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

### Investment commentary

#### **Investment Objective**

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.

The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: MSCI USA Index TR.

It is expected that average outperformance for the Fund will typically not be greater than 0.70% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling 3 year period, although no level of outperformance is guaranteed.

#### **Investment Policy**

The Fund is actively managed and aims to achieve its objectives by investing at least 95% in shares (also known as "equities"). Of the Fund's direct investments:

- at least 80% (and typically at least 90%) will be in shares in companies listed, at the time of purchase, in the United States; and
- a maximum of 20% will be in shares in companies listed, at the time of purchase, outside of the United States.

The Fund may invest globally (in developed markets only) but at least 95% of the Fund's assets must be denominated in or hedged to US Dollars.

The Fund may also invest up to 5% in cash, cash like and other money market instruments.

At least 90% of the Fund will be invested directly. Up to 10% of the Fund can invest indirectly in these asset classes, and in any amount, by purchasing units of Actively Managed and/or Passively Managed Collective Investment Schemes. These Collective Investment Schemes may be managed by any Sub-Investment Manager or other companies (including within the Santander Group).

The Fund may use Derivatives for Efficient Portfolio Management(including hedging), where Derivatives are used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

#### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD has appointed one Sub-Investment Manager to provide investment management services in relation to at least 90% of the Fund. The remainder of the Fund is managed by the ACD. The proportion of the Fund's assets under the management of each of the ACD and Sub-Investment Manager(each such portion of the Fund a **"Mandate"**) is determined by the ACD. The ACD has selected the Sub-Investment Manager based on its ability to deliver the outperformance target associated with its Mandate.

### Investment commentary (continued)

#### Investment Strategy and Process (continued)

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

The Fund is actively managed which means that the ACD and, subject to the investment guidelines agreed with the ACD, the Sub-Investment Manager, will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change.

Each of the Sub-Investment Manager and ACD will select investments that it believes will best achieve its Mandate's outperformance target. Investments will be selected with the aim of achieving capital growth, but some will also provide income for the Fund.

An assessment will be completed, by the ACD or the Sub-Investment Manager, on investment opportunities before investment decisions are made on their respective Mandates.

Although the ACD and the Sub-Investment Manager may have a different investment style or bias, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole is to meet its investment objectives.

With regard to the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected.

In respect of the Mandate representing at least 90% of the Fund managed by the Sub-Investment Manager, the Sub-Investment Manager:

- has a target to outperform the Target Benchmark. Although this is measured over a different period, and calculated on
  a different basis (i.e. before the deduction of the Fund's fees), to the Fund's outperformance target, this is aligned with
  the investment objectives of the Fund overall; and
- is subject to risk management measures (described below) which are commensurate to the outperformance target noted above, and will reference the Target Benchmark.

The Sub-Investment Manager will use its discretion to select companies that it believes will increase in value over time and provide capital growth, with the potential for income, for the Fund.

In selecting the companies whose shares it invests in, the Sub-Investment Manager considers the following key themes as part of its analysis:

- fundamental mispricings: buying shares in high quality businesses at what the Sub-Investment Manager considers to be a fair price leads to strong long term performance;
- high quality business models: companies generating high quality revenues will have sustainable business models and aligned management incentives;
- market themes and trends: trends in financial markets affecting companies globally which may not be ascertained by other investors; and

## Investment commentary (continued)

#### Investment Strategy and Process (continued)

 sentiment analysis: analysing market attitudes to companies of different types to gain insight into future share performance.

The Sub-Investment Manager will adjust the level of emphasis given to each of the above themes depending on a range of factors including: historical returns, turnover, historical and expected volatility of share price, and the number of investors at a given time buying shares in a company or a type of company.

The ACD manages the Mandate representing the remainder of the Fund in line with the Fund's investment objective to outperform the Target Benchmark, and is also subject to the Fund level Tracking Error described below as a risk management measure. Typically the ACD will invest its Mandate in Collective Investment Scheme(s) which offer indirect exposure to the types of shares set out above and which it believes will help the Fund to achieve its investment objectives.

On the basis of the outperformance target and risk management measures applied to each Mandate, it is expected that average outperformance for the Fund will typically not be greater than 0.70% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three year period. The outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of between 2% and 4%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 4% provided this is consistent with the investment strategy of the Fund. The Sub-Investment Manager is also subject to specific investment restrictions which reference the Target Benchmark as part of its investment process (constraints in respect of the sector of the companies the Fund invests in). These are risk management measures.

The risk management measures mean that although the Sub-Investment Manager and the ACD have discretion to select investments for their respective Mandate, the degree to which each Mandate is permitted to deviate from the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. The Sub-Investment Manager and the ACD do not have to invest in the same assets that make up the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up the Target Benchmark, but some of the Fund's investments will reflect the constituents of the Target Benchmark.

#### **Further Information**

The Target Benchmark for the Fund has been selected as it is representative of shares listed in the United States and therefore broadly in line with the investment policy of the Fund.

The Target Benchmark is provided by MSCI Limited, which as at the date of this Prospectus is included in the public register of administrators and benchmarks established and maintained by the FCA.

In respect of the Fund's objective to outperform the Target Benchmark after the deduction of fees, the term "fees" includes all fees, costs, charges, expenses and liabilities which are deducted from the value of Fund property for the purpose of calculating its NAV.

## Investment commentary (continued)

#### Further Information (continued)

If the ACD considers that the Fund's Target Benchmark should be amended as a result of changes to, or evolution of, external market conditions and provided there is no material change to the risk profile of the Fund, it may implement this change after providing Shareholders with reasonable notice in advance.

Variable remuneration of those individuals employed by the ACD who are responsible for: managing a Mandate; and/or the selection and ongoing oversight of the Sub-Investment Manager, is determined by assessing a number of different factors. Insofar as these relate to the investment performance of the Fund, any assessment may be made by comparing Fund performance relative to the Target Benchmark and may also include a comparison against a commercial peer group of competitor funds with similar investment objectives and policies.

The base currency of the Fund is UK Sterling.

Investment Manager Santander Asset Management UK Limited

#### Sub-Investment Manager

Goldman Sachs Asset Management International

#### **Risk Profile**

The main risk within the portfolio relates to changes in the prices of securities held. Other risks include: counterparty risk, country risk, currency risk, investment style and management risk, liquidity risk and stock market risk. The Fund does not borrow in the normal course of business.

#### **Risk and Reward Indicator**

Lower Risk	(				H	ligher Risk
Typically L	ower Rewa	ards	Typically Higher Rewa			er Rewards
1	2	3	4	5	6	7

The risk and reward indicator shown above is based on historical data which may not be a reliable indication for the future risk profile of the Fund.

The lowest risk and reward indicator does not mean risk free.

The risk and reward indicator shown is not guaranteed and may change over time.

## Investment commentary (continued)

#### Performance

Percentage price change from 30 April 2019 to 30 April 2024 (5 years)			
	Cumu	lative	
United States Equities Sterling Accumulation A Shares	71.7	79%	
Percentage price change from 30 April 2021 to 30 April 2024 (3 years)			
	Annualised	Cumulative	
United States Equities Sterling Accumulation A Shares	7.96%	25.84%	
MSCI USA Index TR*	10.47%	34.80%	
Percentage price change from 31 October 2023 to 30 April 2024 (6 mon	ths)		
	Cumu	lative	
United States Equities Sterling Accumulation A Shares	21.5	21.56%	
MSCI USA Index TR*	17.2	17.28%	

Source Lipper - NAV at noon, bid to bid, net of fees, revenue reinvested (accumulation class only).

Source Factset- Market index returns are based on daily index valuations as at close-of-business of the relevant market and are not subject to fees. Past performance is not a guarantee of future performance. The value of investments and the revenue from them can go down aswell as up and investors may not get back the amount originally invested.

\* Please note that the Benchmark was reclassified from Constraint to Target on 7 July 2021. Prior to this date the Fund was not aiming to outperform the Benchmark. Benchmark prior to 7 July 2021 - FTSE USA Index.

## Investment commentary (continued)

#### **Market Review**

US shares performed well over the six months under review –as investor sentiment was lifted by falling inflation and expectations of US Fed rate cuts. Growth stocks (companies that are expected to experience substantial growth in the future) outperformed, as these companies generally perform better when investors believe interest rates will begin to fall.In particular, the technology sector performed well amid positive sentiment towards the sector as the artificial intelligence (AI) trend continued to gain investor attention.

At the beginning of the period, US shares were under pressure as investors were concerned about escalating tensions in the Middle East and that interest rates would remain at elevated levels for the foreseeable future. This was driven by continually strong economic data and persistently high inflation that remained above the Fed's 2% target level.

However, US shares strengthened thereafter, driven by strength in the technology sector and the policy shift by the Fed. With inflation continuing to ease from multi-decade highs, Fed officials stated in December that as many as three interest-rate cuts could be expected in 2024.<sup>1</sup> Investors reacted positively to the news and US shares surged into the end of 2023, with the positive sentiment continuing into the new year.

The first quarter of 2024 was a particularly good one for US share markets, with the S&P 500 Index reaching a record high at the end of March,<sup>2</sup> helped by increasing optimism about the resilience of the US economy. Stock markets were also supported by US companies releasing relatively positive financial results.

Technology companies, particularly those in the semiconductor sector that have benefited from the strong growth prospects in AI, generally announced better-than-expected earnings. However, concerns are starting to take hold about the high costs associated with AI and the potential revenue streams for companies involved.

US share markets witnessed a slight drawback towards the end of the period, as the annual inflation rate increased to an unexpected 3.5% in March,<sup>3</sup> which led to investors tempering their expectations for interest-rate cuts in 2024.

#### Performance Review and Investment Activity (Reporting Period)

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon. The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3-year time period: MSCI USA Index TR.

It is expected that average outperformance for the Fund will typically not be greater than 0.70% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling 3-year period, although no level of outperformance is guaranteed.

<sup>&</sup>lt;sup>1</sup> CNBC, 13 December 2023

<sup>&</sup>lt;sup>2</sup> CNBC, 27 March 2024

<sup>&</sup>lt;sup>3</sup> Financial Times, 10 April 2024

## Investment commentary (continued)

#### Performance Review and Investment Activity (Reporting Period) (continued)

The Fund is actively managed by a Sub-Investment Manager and is at least 95% invested in shares that are denominated in US dollars and listed in developed markets. Of the Fund's direct investments, at least 80% (typically at least 90%) will be in shares in companies listed in the United States. Up to 20% will be in shares in companies listed outside the United States.

The Fund has produced a cumulative return of 71.79% over the last five years, achieving its objective to provide a combination of capital growth and income over a period of five or more years. The Fund's 5-year performance has been aided by strong market returns in the United States. The pandemic led to a global economic downturn, leading to a fall in the Fund's performance in March 2020. Since then, the Fund performance has rebounded driven by the recovery of economic growth and corporate earnings.

Over the past three years, the Fund cumulatively returned 25.84% (7.96% annualised). The Fund has not met its objective to outperform the Target Benchmark, which cumulatively returned 34.80% (10.47% annualised).

The Fund underperformed its benchmark over the three years with 2022 being the main detractor. The relative performance in that year was mainly impacted by the underperformance of the collective investment scheme the Fund held, which accounted for approximately 4% of the Fund's market value at the end of 2022. The collective investment scheme was replaced with another scheme which is seeking to provide better risk adjusted returns and has helped the Fund's performance in 2023. The Manager increased the allocation of this collective investment scheme to approximately 8% in October 2023. This decision improved the performance of the Fund, however, not enough to reverse the underperformance that occurred in 2022.

The Fund delivered a return of 21.56% in the six months through 30 April 2024, while the Target Benchmark returned 17.28%.

The Fund outperformed the MSCI USA Index (net total return, in sterling terms), the Target Benchmark. The Sub-Investment Manager utilises several investment themes in managing the Fund, which helped the Fund to outperform.

Among investment themes, signals within the Sentiment Analysis<sup>4</sup> pillar contributed most positively to relative returns followed by the suite of signals within Fundamental Mispricings,<sup>4</sup> Themes and Trends, and High-Quality Business Models.<sup>4</sup>

Within Sentiment Analysis, investor sentiment factors performed well. Meanwhile, signals gauging changes in valuation within the Fundamental Mispricings pillar helped relative performance. Additionally, within Themes and Trends4, factors evaluating economic linkages added to the relative returns of the portfolio. Finally, traditional profitability related signals helped the performance of the High-Quality Business Models pillar.

Among sectors, the Fund's holdings within the communication services sector contributed the most to relative performance, with an underweight position within the media industry contributing particularly strongly. An underweight position means the Fund has a lower allocation in the relevant sector compared to the Target Benchmark; an overweight position means the Fund has a higher allocation in the sector.

<sup>&</sup>lt;sup>4</sup> In selecting the companies whose shares it invests in, the Sub-Investment Manager considers the following key themes as part of its analysis: fundamental mispricings, high quality business models, market themes and trends and sentiment analysis. A full explanation of these key themes can be found in the Fund Prospectus

## Investment commentary (continued)

#### Performance Review and Investment Activity (Reporting Period) (continued)

At an individual stock level, an overweight position in Dell Technologies, held primarily due to the Sub-Investment Manager's view that it is a high-quality business, performed well. Conversely, an overweight position in Apple, which the Fund similarly holds as the Sub-Investment Manager believes it is a high-quality business, did not do well.

#### Market Outlook

Looking ahead, the Sub-Investment Manager continues to believe that cheaper stocks should outpace more expensive ones and good momentum stocks should do better than poor momentum stocks. The Sub-Investment Manager also prefers companies that research analysts are becoming more positive about and those that are profitable, have sustainable earnings and use their financial health to enhance shareholder value. Therefore, the Sub-Investment Manager expects to remain fully invested and any gains in the Fund's value over time will likely be due to selecting particular companies, as opposed to size allocations in particular sectors or themes.

Robert McElvanney Head of UK Front Office For and on behalf of Santander Asset Management UK Limited June 2024

## Summary of material portfolio changes (unaudited)

for the six months ended 30 April 2024

Purchases	Cost £	Sales	Proceeds £
Home Depot	1,514,015	Alphabet	1,722,080
Apple	1,215,501	Adobe	1,463,798
Salesforce	1,148,203	Dell Technologies	1,225,401
Sherwin-Williams	1,085,363	Linde	1,095,558
Adobe	1,059,605	AbbVie	1,063,146
Cisco Systems	943,978	Bank of America	1,002,063
Tesla	896,628	Meta Platforms	982,189
ConocoPhillips	864,951	Chipotle Mexican Grill	925,575
American Express	856,719	Tesla	899,883
Eaton	833,275	Cisco Systems	894,096
Applied Materials	824,074	International Business Machines	867,618
Citigroup	813,594	Oracle	864,746
Ford Motor	800,970	United Parcel Service	862,190
Dell Technologies	795,699	Microsoft	849,530
Oracle	790,156	Zoetis	845,311
Booking	777,537	Vertex Pharmaceuticals	838,985
Illinois Tool Works	773,487	Capital One Financial	826,349
Cheniere Energy	755,092	Centene	819,168
Cintas	734,912	Sherwin-Williams	788,753
ServiceNow	732,298	Boston Scientific	773,517

Total cost of purchases for the period

61,601,849 Total proceeds from sales for the period

64,800,056

## Portfolio statement (unaudited)

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Equities 89.23% (89.62%)			
<b>Advertising 0.44% (nil)</b> Trade Desk	4,644	307,276	0.44
Trade Desk	4,044		
		307,276	0.44
Aerospace & Defence nil (0.62%)			
Agriculture 0.34% (0.38%)			
Archer-Daniels-Midland	5,047	236,399	0.34
		236,399	0.34
Apparel 0.96% (nil)	1.001	672.010	0.05
Deckers Outdoor	1,031	672,910	0.96
		672,910	0.96
Automobile ABS 0.33% (0.92%)			
Lear	2,342	235,425	0.33
	—	235,425	0.33
		233,123	0.55
Automobile Manufacturers 1.40% (1.41%)			
Ford Motor	51,613	500,817	0.72
Tesla	3,275	479,369	0.68
		980,186	1.40
Banks 3.17% (3.06%)			
Bank of America	8,920	263,579	0.37
Bank of New York Mellon	1,543	69,611	0.10
Citigroup	17,861	874,827	1.25
First Citizens BancShares	327	440,047	0.63
JPMorgan Chase	650	99,518	0.14
Morgan Stanley	6,604	478,891	0.68
		2,226,473	3.17
Beverages 0.99% (0.86%)			
Monster Beverage	16,299	695,749	0.99
		695,749	0.99

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Biotechnology 0.89% (2.03%)			
Gilead Sciences	6,655	346,423	0.49
Vertex Pharmaceuticals	887	278,231	0.40
		624,654	0.89
Building Materials 0.81% (1.78%)			
Carrier Global	1,302	63,917	0.09
Lennox International	156	57,683	0.08
Martin Marietta Materials	209	98,036	0.14
Vulcan Materials	1,706	351,010	0.50
		570,646	0.81
Chemicals 1.57% (1.52%)			
Axalta Coating Systems	295	7,407	0.01
Linde	542	190,781	0.27
RPM International	7,287	622,172	0.89
Sherwin-Williams	1,182	282,693	0.40
		1,103,053	1.57
Commercial Services 2.35% (0.03%)			
Cintas	1,415	743,543	1.06
FTI Consulting	2,884	493,285	0.70
Gartner	1,258	414,658	0.59
	_	1,651,486	2.35
Computers 7.30% (9.79%)			
Apple	31,955	4,338,418	6.18
Crowdstrike	2,619	611,124	0.87
HP	1,874	42,040	0.06
International Business Machines	1,018	135,105	0.19
	_	5,126,687	7.30
Distribution & Wholesale 0.16% (1.71%)			
Pool	379	109,688	0.16
2001		•	
		109,688	0.16
Diversified Financial Services 5.50% (4.14%)			
American Express	4,500	840,882	1.20
Ameriprise Financial	1,488	489,353	0.70
CME	4,590	768,293	1.09
Coinbase Global	154	25,081	0.04

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Diversified Financial Services (continued)			
Discover Financial Services	1,756	177,626	0.25
Visa	6,064	1,300,989	1.85
Voya Financial	4,767	259,527	0.37
		3,861,751	5.50
Electricity 0.20% (0.48%)			
Xcel Energy	3,257	139,706	0.20
		139,706	0.20
Electronic & Electrical Equipment 2.26% (0.99%)			
АМЕТЕК	5,280	736,160	1.05
Eaton	3,338	848,422	1.21
		1,584,582	2.26
Electronics 1.47% (1.56%)			
Mettler-Toledo International	602	591,212	0.84
nVent Electric	3,440	197,969	0.28
Woodward	1,906	247,141	0.35
		1,036,322	1.47
Engineering & Construction 0.09% (nil)			
MasTec	925	65,503	0.09
	_	65,503	0.09
Entertainment nil (0.05%)			
Environmental Control nil (0.08%)			
Food & Beverages nil (1.09%)			
Gas 0.34% (nil)			
Atmos Energy	2,570	241,945	0.34
	_	241,945	0.34
Healthcare Products nil (0.90%)			
Healthcare Services 6.04% (4.72%)			
Centene	1,800	105,026	0.15
Elevance Health	1,319	557,579	0.79
HCA Healthcare	1,720	425,415	0.60

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Healthcare Services (continued)			
Humana	669	161,396	0.23
IQVIA	3,689	682,884	0.97
Medpace	1,536	476,226	0.68
Quest Diagnostics	6,698	739,099	1.05
Tenet Healthcare	2,724	244,108	0.35
UnitedHealth	1,904	735,142	1.05
Universal Health Services	876	119,232	0.17
		4,246,107	6.04
Home Builders 0.93% (1.03%)			
DR Horton	5,755	654,806	0.93
		654,806	0.93
Household Goods 0.18% (1.10%)			
Kimberly-Clark	1,189	129,644	0.18
		129,644	0.18
Insurance 4.78% (5.32%)			
Berkshire Hathaway	4,482	1,420,216	2.02
Kinsale Capital	55	15,955	0.02
MetLife	5,632	319,708	0.45
Progressive	5,310	883,424	1.26
Travelers	4,253	720,410	1.03
		3,359,713	4.78
Internet 11.16% (11.68%)			
Alphabet 'A'	498	64,716	0.09
Alphabet 'C'	16,700	2,194,747	3.12
Amazon.com	21,311	2,982,502	4.25
Maplebear	2,142	58,333	0.08
Meta Platforms	3,329	1,143,183	1.63
Netflix	2,196	965,475	1.37
Pinterest	8,257	220,644	0.31
Robinhood Markets	5,339	70,226	0.10
VeriSign	1,064	143,963	0.21
		7,843,789	11.16
Leisure Time 0.48% (nil)		<b>.</b>	
Carnival	28,235	334,179	0.48
		334,179	0.48

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Lodging nil (2.05%)			
Machinery Construction & Mining nil (0.24%)			
Machinery Construction & Mining Int (0.24%)			
Machinery Diversified 0.43% (nil)			
Otis Worldwide	2,720	198,089	0.28
Westinghouse Air Brake Technologies	784	100,831	0.15
		298,920	0.43
Media nil (0.07%)			
Miscellaneous Manufacturing 2.15% (nil)			
Illinois Tool Works	3,780	736,770	1.05
Parker-Hannifin	1,781	775,382	1.10
		1,512,152	2.15
Oil & Gas 2.24% (1.70%)			
ConocoPhillips	8,298	832,484	1.18
Devon Energy	18,214	744,183	1.06
		1,576,667	2.24
Pharmaceuticals & Biotechnology 0.84% (2.87%)			
Eli Lilly	314	195,853	0.28
Johnson & Johnson	415	47,925	0.06
Pfizer	6,834	139,720	0.20
Zoetis	1,648	209,555	0.30
		593,053	0.84
Pipelines 0.51% (nil)			
Antero Midstream	16,568	182,994	0.26
Cheniere Energy	1,364	171,906	0.25
		354,900	0.51
Real Estate Investment Trusts 2 229/ (2 829/)			
Real Estate Investment Trusts 2.32% (2.82%) Camden Property Trust	1,937	154,230	0.22
First Industrial Realty Trust	1,957	69,437	0.22
Host Hotels & Resorts	44,285	667,378	0.10
Lamar Advertising	751	69,483	0.55
Omega Healthcare Investors	1,236	30,028	0.04
Park Hotels & Resorts	49,428	637,119	0.91
	·	1,627,675	2.32

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
		_	
Retailers 4.69% (3.44%)	170	454.400	
Chipotle Mexican Grill	179	451,136	0.64
Costco Wholesale	1,952	1,126,272	1.60
Darden Restaurants	1,128	138,208	0.20
Home Depot	3,295	879,123	1.25
Ross Stores	3,540	366,312	0.52
Target	1,427	183,425	0.26
Wingstop	496	152,391	0.22
		3,296,867	4.69
Semiconductors 8.10% (4.33%)			
Advanced Micro Devices	1,841	232,832	0.33
Applied Materials	5,603	888,542	1.27
Broadcom	177	183,630	0.26
Intel	818	19,879	0.03
KLA	1,001	550,236	0.78
Micron Technology	1,066	96,141	0.14
Nvidia	4,059	2,798,300	3.98
Texas Instruments	6,558	923,405	1.31
		5,692,965	8.10
Tech - Software & Services 12.85% (12.10%)			
Adobe	1,651	609,900	0.87
Fiserv	6,526	795,482	1.13
HubSpot	561	271,246	0.39
Intuit	1,836	916,776	1.31
Microsoft	12,664	3,936,293	5.60
Oracle	8,147	739,779	1.05
Palantir Technologies	3,354	58,822	0.08
Roper Technologies	895	364,997	0.52
Salesforce	3,565	765,415	1.09
ServiceNow	1,025	567,309	0.81
		9,026,019	12.85
Telecommunications 0.95% (1.33%)			
Motorola Solutions	2,456	665,022	0.95
		665,022	0.95

as at 30 April 2024

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Transportation 0.01% (1.42%)			
Saia	30	9,488	0.01
	_	9,488	0.01
Total Equities	_	62,692,407	89.23
Collective Investment Schemes 8.44% (8.16%)			
Brown Advisory US Sustainable Growth Fund	317,404	5,926,528	8.44
		5,926,528	8.44
Futures -0.04% (-0.05%)			
S&P 500 E-Mini Jun '24	5	(24,837)	(0.04)
		(24,837)	(0.04)
Portfolio of investments		68,594,098	97.63
Net other assets		1,662,664	2.37
Total net assets		70,256,762	100.00

Figures in brackets represent sector distribution at 31 October 2023.

All equity shares are listed ordinary shares unless otherwise stated.

Collective Investment Scheme securities are not listed and are valued using publicly available market data unless otherwise stated.

Futures securities are derivative instruments listed on recognised exchanges.

## Statistical information (unaudited)

for the six months ended 30 April 2024

	Sterling Accumulation A Shares			
	30.04.2024	31.10.2023	31.10.2022	31.10.2021
Other information				
Closing net asset value (£)	70,256,762	62,091,479	76,330,120	84,309,128
Closing number of shares	9,300,072	9,748,085	12,048,776	12,694,045
Net asset value per shares(p)	755.44	636.96	633.51	664.16
Prices				
Highest share price (p)	785.9	666.8	697.1	668.3
Lowest share price (p)	638.0	577.9	550.1	508.7

#### Ongoing Charges Figure (OCF)

The OCF provides investors with a clearer picture of the total annual costs in running a Collective Investment Scheme. The OCF consists principally of the ACD's periodic charge, but also includes the costs for other services paid in respect of Depositary, custody, FCA, taxation services, audit fees and transaction charges. Collectively these fees are known as other expenses.

Expense Type	Period to 30.04.2024	Year to 31.10.2023
Sterling Accumulation A Shares		
ACD's periodic charge	0.65%	0.65%
Other expenses	0.09%	0.08%
Ongoing charges figure*	0.74%	0.73%

\*The current period OCF is annualised based on the fees suffered during the accounting period.

## Financial Statements - United States Equities (unaudited)

## Statement of total return (unaudited)

#### for the six months ended 30 April 2024

	2024		202	3
	£	£	£	£
Income Net capital gains/(losses) Revenue Expenses Interest payable and similar charges	393,329 (235,316) (1,167)	11,185,579	537,372 (230,654) (1,064)	(3,855,966)
Net revenue before taxation Taxation	156,846 (53,766)		305,654 (71,583)	
Net revenue after taxation Total return before distributions		103,080	-	234,071 (3,621,895)
Distributions		(76,119)		(234,071)
Change in net assets attributable to shareholders from investment activities		11,212,540	-	(3,855,966)

## Statement of change in net assets attributable to shareholders (unaudited)

#### for the six months ended 30 April 2024

	2024		2023	
	£	£	£	£
Opening net assets attributable to shareholders		62,091,479*		76,330,120
Amounts receivable on issue of shares Amounts payable on cancellation of shares	2,404,619 (5,529,386)		8,833,920 (18,963,762)	
		(3,124,767)		(10,129,842)
Dilution adjustment		1,391		3,015
Change in net assets attributable to shareholders				
from investment activities		11,212,540		(3,855,966)
Retained distribution on accumulation shares		76,119		234,071
Closing net assets attributable to shareholders		70,256,762	· · · · · · · · · · · · · · · · · · ·	62,581,398*

\* The net assets at the start of the current period do not equal the net assets at the end of the comparative period as they are not consecutive periods.

## Balance sheet (unaudited)

as at 30 April 2024

	30 April 2024 £	31 October 2023 £
Assets:		
Fixed assets:		
Investments	68,618,935	60,709,113
Current assets:		
Debtors	1,947,964	1,885,874
Cash and bank balances	3,372,061	3,236,118
Total assets	73,938,960	65,831,105
Liabilities:		
Investment liabilities	(24,837)	(27,695)
Creditors	(1 750 700)	(1 700 200)
Bank overdrafts Other creditors	(1,759,722)	(1,799,298)
	(1,897,639)	(1,912,633)
Total liabilities	(3,682,198)	(3,739,626)
Net assets attributable to shareholders	70,256,762	62,091,479

#### Accounting policies

The interim financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014.

The accounting policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

The distribution policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

# Distribution tables (unaudited)

#### for the six months ended 30 April 2024

Distributions on Sterling Accumulation A Shares in pence per share

Payment	Payment	Distribution	Distribution
date	type	payable	paid
		2024	2023
30.06.24	interim	0.8185	2.2581

#### Accumulation distributions

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

### Investment commentary

#### **Investment Objective**

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.

The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: FTSE Japan Index TR.

It is expected that average outperformance for the Fund will typically not be greater than 0.50% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling 3 year period, although no level of outperformance is guaranteed.

#### **Investment Policy**

The Fund is actively managed and aims to achieve its objectives by investing at least 95% in shares (also known as "equities"). Of the Fund's direct investments:

- at least 80% (and typically at least 90%) will be in shares in a wide range of companies listed, at the time of purchase, in Japan; and
- a maximum of 20% will be in shares in companies listed, at the time of purchase, outside of Japan.

The Fund invests in developed markets only.

The Fund may also invest up to 5% in cash, cash like and other money market instruments.

At least 90% of the Fund will be invested directly. Up to 10% of the Fund can invest indirectly in these asset classes, and in any amount, by purchasing units of Actively Managed and / or Passively Managed Collective Investment Schemes. These Collective Investment Schemes may be managed by the ACD, any Sub-Investment Manager or other companies (including within the Santander Group).

The Fund may use Derivatives for Efficient Portfolio Management(including hedging), where Derivatives are used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

#### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD has appointed one Sub-Investment Manager to provide investment management services in relation to at least 90% of the Fund. The remainder of the Fund is managed by the ACD. The proportion of the Fund's assets under the management of each of the ACD and Sub-Investment Manager(each such portion of the Fund a "Mandate") is determined by the ACD. The ACD has selected the Sub-Investment Manager based on its ability to deliver the outperformance target associated with its Mandate.

### Investment commentary (continued)

#### Investment Strategy and Process (continued)

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

The Fund is actively managed which means that the ACD and, subject to the investment guidelines agreed with the ACD, the Sub-Investment Manager, will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change.

Each of the Sub-Investment Manager and ACD will select investments that it believes will best achieve its Mandate's outperformance target. Investments will be selected with the aim of achieving capital growth, but some will also provide income for the Fund.

An assessment will be completed, by the ACD or the Sub-Investment Manager, on investment opportunities before investment decisions are made on their respective Mandates.

Although the ACD and the Sub-Investment Manager may have a different investment style or bias, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole is to meet its investment objectives.

With regard to the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected.

In respect of the Mandate representing at least 90% of the Fund managed by the Sub-Investment Manager, the Sub-Investment Manager has a target to outperform the Target Benchmark. Although this is measured over a different period, and calculated on a different basis (i.e. before the deduction of the Fund's fees), to the Fund's outperformance target, this is aligned with the investment objectives of the Fund overall. In addition, the investment guidelines agreed with the ACD include risk management measures, which are commensurate to the outperformance target. These measures refer to the Target Benchmark and mean that the Sub-Investment Manager will be restricted in its selection of shares, due to requirements on the amount, size and sector of companies which can be held by the Fund, when compared to the companies which make up the Target Benchmark. As a result, the Mandate will be restricted in how far it can deviate from the Target Benchmark.

The Sub-Investment Manager will select shares in companies for its Mandate which it believes offer the best level of potential returns (and therefore capital growth, with the potential for income, for the Fund). Its selection of these shares involves two key steps:

- assigning shares in a company a rating based on a number of criteria which consider factors such as the company's growth, profitability, debt, and momentum (i.e. the company's share price has performed well over a short period and is expected to continue to do so), and then assessing its longer term (strategic) and shorter term (tactical) prospects as part of the Fund's portfolio; and
- on the basis of this analysis, selecting shares which are consistent with the risk management measures.

### Investment commentary (continued)

#### Investment Strategy and Process (continued)

The ACD manages the Mandate representing the remainder of the Fund in line with the Fund's investment objective to outperform the Target Benchmark, and is also subject to the Fund level Tracking Error described below as a risk management measure. Typically the ACD will invest its Mandate in Collective Investment Scheme(s) which offer indirect exposure to the types of shares set out above and which it believes will help the Fund to achieve its investment objectives.

On the basis of the outperformance target and risk management measures applied to each Mandate, it is expected that average outperformance for the Fund will typically not be greater than 0.50% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three year period. The outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of between 0.5% and 3%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 3% provided this is consistent with the investment strategy of the Fund.

The Tracking Error and other risk management measures mean that although the Sub-Investment Manager and the ACD have discretion to select investments for their respective Mandate, the degree to which each Mandate is permitted to deviate from the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. Although the Sub-Investment Manager and the ACD do not have to invest in the same assets that make up the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up the Target Benchmark, some of the Fund's investments will reflect the constituents of the Target Benchmark.

#### **Further Information**

The Target Benchmark for the Fund has been selected as it is representative of shares listed in Japan and therefore broadly in line with the investment policy of the Fund.

The Target Benchmark is provided by FTSE International Limited, which as at the date of this Prospectus is included in the public register of administrators and benchmarks established and maintained by the FCA.

In respect of the Fund's objective to outperform the Target Benchmark after the deduction of fees, the term "fees" includes all fees, costs, charges, expenses and liabilities which are deducted from the value of Fund property for the purpose of calculating its NAV.

If the ACD considers that the Fund's Target Benchmark should be amended as a result of changes to, or evolution of, external market conditions and provided there is no material change to the risk profile of the Fund, it may implement this change after providing Shareholders with reasonable notice in advance.

Variable remuneration of those individuals employed by the ACD who are responsible for: managing a Mandate; and/or the selection and oversight of the Sub-Investment Manager, is determined by assessing a number of different factors. Insofar as

### Investment commentary (continued)

#### Further Information (continued)

these relate to the investment performance of the Fund, any assessment may be made by comparing Fund performance relative to the Target Benchmark and may also include a comparison against a commercial peer group of competitor funds with similar investment objectives and policies.

The base currency of the Fund is UK Sterling.

#### Investment Manager

Santander Asset Management UK Limited

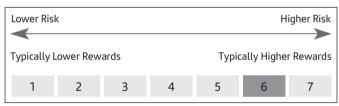
#### Sub-Investment Manager

Amundi Japan Limited

#### **Risk Profile**

The main risk within the portfolio relates to changes in the prices of securities held. Other risks include: counterparty risk, country risk, currency risk, investment style and management risk, liquidity risk and stock market risk. The Fund does not borrow in the normal course of business.

#### **Risk and Reward Indicator**



The risk and reward indicator shown above is based on historical data which may not be a reliable indication for the future risk profile of the Fund.

The lowest risk and reward indicator does not mean risk free.

The risk and reward indicator shown is not guaranteed and may change over time.

## Investment commentary (continued)

#### Performance

#### **Capital Growth**

Percentage price change from 30 April 2019 to 30 April 2024 (5 years)					
	Cumulativ	Cumulative			
Japan Equities Sterling Accumulation A Shares	42.80%	42.80%			
Percentage price change from 30 April 2021 to 30 April 2024 (3 years)					
	Annualised Cu	mulative			
Japan Equities Sterling Accumulation A Shares	6.15%	19.61%			
FTSE Japan Index TR*	5.71%	18.13%			
Percentage price change from 31 October 2023 to 30 April 2024 (6 mor	nths)				
	Cumulativ	Cumulative			
Japan Equities Sterling Accumulation A Shares	17.19%	17.19%			
FTSE Japan Index TR*	15.11%	15.11%			

Source Lipper - NAV at noon, bid to bid, net of fees, revenue reinvested (accumulation class only).

Source Factset- Market index returns are based on daily index valuations as at close-of-business of the relevant market and are not subject to fees. Past performance is not a guarantee of future performance. The value of investments and the revenue from them can go down as well as up and investors may not get back the amount originally invested.

\* Please note that the Benchmark was reclassified from Constraint to Target on 7 July 2021. Prior to this date the Fund was not aiming to outperform the Benchmark.

### Investment commentary (continued)

#### **Market Review**

Over the six-month period, Japanese stocks performed well. Earlier in the period, the Japanese stock market experienced mixed performance. The market was influenced by factors including monetary policy changes in the US and Japan, as well as geopolitical risks. Growth stocks (companies that investors expect to grow) outperformed value stocks (those that investors believe are undervalued), indicating a shift in market dynamics.

At the beginning of the review period, the market declined due to signs of weakness in the US stock market. Japanese stocks initially advanced but then declined in November due to the market pricing in higher interest rates in the US, higher crude oil prices and concerns about a possible US government shutdown. Towards year-end, long-term interest rates in the US decreased, leading to a stronger yen against the dollar, which weighed on Japanese stocks. However, when the Bank of Japan (BoJ) made no policy changes during its December meeting, Japanese stocks rebounded.

Moving into 2024, the Japanese stock market experienced a significant surge. The rally was driven by buying from foreign investors, who were optimistic about Japan's potential exit from deflation (a reduction in the level of consumer prices). Additionally, the BoJ ended its negative interest-rate policy.

The uptrend was also influenced by rallies in the US stock market, yen depreciation (which benefited export-related companies) and expectations for the BoJ to normalise its monetary policy. In February, foreign investors increasingly purchased high-priced Japanese stocks, leading to a new record high for the Nikkei Stock Average. In March, the conclusion of spring wage negotiations between companies and labour unions, which resulted in an average wage hike of 5.28%,<sup>6</sup> further supported the positive sentiment. As a result, the Nikkei Stock Average surpassed the 40,000 mark,<sup>7</sup> with heightened expectations for Japan to exit its deflationary spiral.

#### Performance Review and Investment Activity (Reporting Period)

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon. The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling 3 year time period: FTSE Japan Index TR.

It is expected that average outperformance for the Fund will typically not be greater than 0.50% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling 3 year period, although no level of outperformance is guaranteed.

The Fund is actively managed by a Sub-Investment Manager and invests at least 95% in shares in developed markets. At least 80% (typically at least 90%) of the Fund's investments will be in shares in companies listed in Japan, while up to 20% can be in shares in companies listed outside Japan. The Fund may invest up to 5% in cash/cash-like instruments.

The Fund has produced a cumulative return of 42.80% over the last five years, achieving its objective to provide a combination of capital growth and income over a period of five or more years.

<sup>7</sup> Bloomberg UK, 4 March 2024

<sup>&</sup>lt;sup>6</sup> The Japan Times, 15 March 2024

### Investment commentary (continued)

#### Performance Review and Investment Activity (Reporting Period) (continued)

Over a five-year period, the Fund's performance mainly came from the Sub-Investment Manager's stock picks in the industrials, consumer discretionary and materials sectors. The largest contributors were three shipping companies (Nippon Yusen, Mitsui OSK and Kawasaki Kisen), followed by Inpex Corporation and Screen Holding, while the biggest detractors from performance were Peptidream, Mitsubishi Corp and Olympus.

Over the past three years, the Fund cumulatively returned 19.61% (6.15% annualised). The Fund has met its objective to outperform the Target Benchmark, which cumulatively returned 18.13% (5.71% annualised).

Over a three-year period, the Fund performed better than the benchmark. The positive performance was mainly related to stock selection in the industrial, consumer discretionary and communication services sectors. Conversely, the Sub-Investment Manager's selection of healthcare shares detracted from performance. Similar to the five-year performance, the most significant contributors to performance were the three shipping companies (Nippon Yusen, Mitsui OSK and Kawasaki Kisen), followed by Inpex Corporation and Screen Holding. The key detractors from performance were Peptidream, Mitsubishi Corp and Olympus.

The Fund delivered a return of 17.19% in the six months through 30 April 2024, while the Target Benchmark returned 15.11%.

The Fund outperformed the benchmark over the period, with stock selection contributing positively, while the Sub-Investment Manager's sector allocation decisions proved slightly negative.

The choice of shares in the information technology, industrials and consumer discretionary sectors benefited the Fund's performance, while there was a negative contribution from holding the shares of consumer staples and healthcare companies. The main individual company contributors over the period were Screen Holdings, Fujikura and Horiba, which were overweight relative to the benchmark. An overweight exposure means that the Fund holds a relatively larger position in a company than the benchmark. However, the Fund's performance suffered from holding the shares of Mitsubishi Corporation, Takara Holdings and Odakyu Electric Railway.

Over the six months, the Sub-Investment Manager increased the Fund's exposure to growth stocks, while the Fund's exposure to value stocks stayed relatively large compared to the benchmark.

#### Market Outlook

Global equity markets ended the period on a positive note, with Japanese equities performing particularly well. Japan's TOPIX index increased strongly, driven by strong performance in more economically sensitive sectors such as industrials and consumer discretionary. This rally was largely fuelled by foreign investors, optimistic about Japan's potential exit from deflation.

Recently, there were several noteworthy developments in Japan. Firstly, the Nikkei 225 index reached an all-time high. Secondly, the Japanese yen weakened to its lowest level against the US dollar in 34 years,<sup>8</sup> which was beneficial for export-

<sup>8</sup> Nikkei Asia, 15 April 2024

### Investment commentary (continued)

#### Market Outlook (continued)

oriented companies. Thirdly, Japanese unions announced the largest wage hikes in 33 years,<sup>9</sup> indicating improving economic conditions. Lastly, the BoJ raised its short-term interest-rate target for the first time in 17 years.<sup>10</sup>

Strong inflows from overseas investors contributed to a concentration of market gains in the shares of larger companies. Additionally, Japanese companies have been increasing their share buybacks, despite the market's strong rally. This trend is expected to continue, given the high levels of cash held by Japanese companies.

In terms of valuations, Japanese equities remain attractive compared to their global peers. Furthermore, Japanese corporate earnings have been robust, and solid earnings-per-share growth is expected for the fiscal year 2024.

Overall, the Japan equity market does not appear to be overshooting, and there are positive factors supporting its continued growth.

Robert McElvanney Head of UK Front Office For and on behalf of Santander Asset Management UK Limited June 2024

<sup>9</sup> Reuters, 4 April 2024

<sup>&</sup>lt;sup>10</sup> Trading Economics, 19 March 2024

## Summary of material portfolio changes (unaudited)

for the six months ended 30 April 2024

Purchases	Cost £	Sales	Proceeds £
Shin-Etsu Chemical	621,261	Keyence	518,347
Hitachi	541,726	Japan Post	496,722
Nintendo	464,211	Oriental Land	446,620
Canon	443,008	Bridgestone	421,845
Chugai Pharmaceutical	415,396	Astellas Pharma	394,348
Sompo	391,228	Nisshin Seifun	373,235
Nitto Denko	378,241	Toshiba	357,976
Renesas Electronics	375,694	Toyota Motor	355,186
Shionogi	367,442	Daido Steel	344,278
Subaru	349,201	Nomura	336,335
TBS	348,191	SBI	333,594
Kyoto Financial	323,580	Benefit One	327,719
Sojitz	318,565	Ebara	317,837
Mazda Motor	309,594	SG	310,411
Tokyu Fudosan	306,931	Nipro	309,952
SCREEN	304,322	Daicel	309,747
Yamato Kogyo	304,035	Nomura Research Institute	305,004
Open House	299,804	Advantest	303,436
COMSYS	298,762	Haseko	300,295
Odakyu Electric Railway	296,462	Kakaku.com	299,504

Total cost of purchases for the period

14,567,839 Total proceeds from sales for the period

18,138,546

## Portfolio statement (unaudited)

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Equities 94.38% (95.91%)			
Aerospace & Defence nil (0.18%)			
Automobile Manufacturers 7.35% (5.11%)			
Honda Motor	9,500	87,337	0.30
Mazda Motor	32,300	294,896	1.01
Subaru	20,300	363,154	1.24
Toyota Motor	76,300	1,406,390	4.80
		2,151,777	7.35
Automobile Parts & Equipment 3.10% (2.73%)			
JTEKT	33,900	209,547	0.72
Niterra	14,200	372,648	1.27
Toyo Tire	21,400	324,131	1.11
		906,326	3.10
Banks 6.09% (5.88%)			
Hachijuni Bank	19,900	106,396	0.36
Kyoto Financial	22,200	316,363	1.08
Mebuki Financial	45,800	129,652	0.44
Mitsubishi UFJ Financial	60,200	481,491	1.65
Mizuho Financial	3,100	47,905	0.16
Shizuoka Financial	22,800	169,978	0.58
Sumitomo Mitsui Financial	10,600	482,433	1.65
Sumitomo Mitsui Trust	2,900	48,818	0.17
		1,783,036	6.09
Beverages 1.36% (0.99%)			
Ito En	9,200	178,636	0.61
Takara	41,700	218,928	0.75
	,	397,564	1.36
Building Materials 0.99% (1.20%)			
Sanwa	22,100	290,151	0.99
		290,151	0.99
Chemicals 4.46% (3.15%)			
Kansai Paint	20,400	213,272	0.73
Nitto Denko	5,200	344,653	1.18

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Chemicals (continued)			
NOF	1,500	16,146	0.05
Shin-Etsu Chemical	23,300	730,414	2.50
		1,304,485	4.46
Commercial Services 0.88% (1.58%)			
Recruit	3,400	118,887	0.41
TechnoPro	10,200	139,325	0.47
		258,212	0.88
Computers 1.90% (2.36%)			
BIPROGY	12,000	279,896	0.96
NEC Networks & System Integration	20,800	276,250	0.94
		556,146	1.90
Distribution & Wholesale 4.80% (3.39%)			
Mitsui	19,400	749,832	2.56
Sojitz	15,500	318,425	1.09
Toyota Tsusho	6,600	337,462	1.15
		1,405,719	4.80
Diversified Financial Services 2.73% (3.78%)			
Acom	79,800	164,869	0.57
Credit Saison	19,600	290,601	0.99
Orient	40,100	209,613	0.72
Zenkoku Hosho	4,700	132,286	0.45
		797,369	2.73
Electronic & Electrical Equipment 1.19% (1.92%)			
Fujikura	25,300	349,112	1.19
		349,112	1.19
Electronics 3.83% (1.30%)			
Horiba	4,500	352,839	1.21
Jeol	3,700	118,129	0.40
SCREEN	4,100	344,884	1.18
Shimadzu	14,000	305,728	1.04
		1,121,580	3.83
Engineering & Construction 3.32% (2.21%)			
COMSYS	16,500	308,656	1.06

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
	-		
Engineering & Construction (continued) Infroneer	24.400	242.000	0.92
JGC	34,400 13,700	243,888 105,751	0.83 0.36
Kandenko	35,200	311,905	1.07
		970,200	3.32
		0.0,200	5.5
Entertainment 0.69% (1.64%)			
Oriental Land	1,200	26,558	0.09
Sankyo	20,100	175,096	0.60
		201,654	0.69
Food & Beverages 1.84% (5.25%)			
Aeon	19,000	317,913	1.09
Morinaga Milk Industry	14,100	220,611	0.75
		538,524	1.84
Gas 0.37% (0.31%)			
Tokyo Gas	6,100	109,404	0.37
	0,100	109,404	0.37
		,	
Hand & Machine Tools 3.50% (1.88%)			
DMG Mori	17,700	378,712	1.29
Fuji Electric	7,900	394,269	1.35
OSG	24,300	251,701	0.86
		1,024,682	3.50
Healthcare Products 1.24% (3.24%)			
Olympus	32,500	361,790	1.24
		361,790	1.24
Home Builders 3.14% (4.46%)			
Daiwa House Industry	15,100	340,018	1.16
Open House	11,400	278,456	0.95
Sumitomo Forestry	12,100	299,422	1.03
		917,896	3.14
Home Furnishings 1.43% (1.69%)	6 200	117 720	1 40
Sony	6,300	417,720	1.43
		417,720	1.43

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Household Goods 0.30% (0.24%)			
Ushio	8,300	87,425	0.30
		87,425	0.30
Insurance 2.32% (2.21%)			
MS&AD Insurance	11,700	168,781	0.57
Sompo	25,100	397,178	1.36
Tokio Marine	4,500	113,662	0.39
		679,621	2.32
Internet 1.09% (1.88%)			
GMO internet	19,300	254,957	0.87
ZOZO	3,700	63,919	0.22
		318,876	1.09
Iron & Steel 1.47% (1.22%)			
Nippon Steel	9,400	168,637	0.57
Yamato Kogyo	6,100	262,488	0.90
		431,125	1.47
Leisure Time 1.02% (0.98%)			
Yamaha Motor	39,800	297,524	1.02
	_	297,524	1.02
Machinery Construction & Mining 3.45% (0.46%)			
Hitachi	10,900	807,081	2.76
Komatsu	8,400	202,066	0.69
	_	1,009,147	3.45
Machinery Diversified 1.06% (5.21%) Keyence	876	311,021	1.06
		311,021	1.06
Madia 1 200/ (n:1)			
<b>Media 1.30% (nil)</b> TBS	18,200	380,082	1.30
	—	380,082	1.30

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
investment	50 April	L	70
Miscellaneous Manufacturing nil (1.30%)			
Office & Business Equipment 2.24% (0.90%)			
Canon	19,400	421,288	1.44
Canon Marketing Japan	10,700	235,347	0.80
	_	656,635	2.24
Oil & Gas 1.29% (1.49%)			
Inpex	31,200	378,511	1.29
	·	378,511	1.29
Pharmaceuticals & Biotechnology 4.96% (5.87%)			
Chugai Pharmaceutical	14,800	378,103	1.29
Daiichi Sankyo	4,500	121,838	0.42
Nippon Shinyaku	6,000	132,792	0.45
Ono Pharmaceutical	21,800	251,031	0.86
Rohto Pharmaceutical	14,400	225,013	0.77
Shionogi Talada Dhamaa aastiaal	8,400	314,311	1.07
Takeda Pharmaceutical	1,400	29,436	0.10
		1,452,524	4.96
Real Estate 1.25% (1.04%)			
Tokyo Tatemono	2,900	38,722	0.13
Tokyu Fudosan	55,700	327,905	1.12
		366,627	1.25
Real Estate Investment Trusts 0.55% (0.35%)	205	00 140	0.24
Japan Metropolitan Fund Invest Mori Hills REIT Investment	88	99,148	0.34 0.21
Mon mills ken investment	00	61,273	
		160,421	0.55
Retailers 3.95% (1.77%)			
Fast Retailing	2,550	537,579	1.84
Lawson	6,100	319,636	1.09
Ryohin Keikaku	23,100	299,528	1.02
		1,156,743	3.95
Semiconductors 4.45% (4.24%)			
Renesas Electronics	29,700	395,508	1.35
Tokyo Electron	5,110	907,922	3.10
	_	1,303,430	4.45

Investment	Holding or nominal value of positions at 30 April	Market value £	Percentage of total net assets %
Tech - Software & Services nil (2.68%)			
Telecommunications 2.93% (3.09%)			
Hikari Tsushin	1,400	182,385	0.62
KDDI	11,300	251,813	0.86
Nippon Telegraph & Telephone	455,200	394,340	1.35
SoftBank	3,100	30,041	0.10
		858,579	2.93
Toys, Games & Hobbies 2.49% (1.39%)			
Nintendo	11,800	461,713	1.58
Sanrio	19,800	268,093	0.91
	_	729,806	2.49
Transportation 4.05% (5.34%)			
Kawasaki Kisen Kaisha	18,000	201,609	0.69
Mitsui OSK Lines	10,500	265,318	0.91
Nippon Yusen	9,900	224,182	0.76
Odakyu Electric Railway	22,700	204,081	0.70
Seibu	23,200	289,051	0.99
		1,184,241	4.05
Total Equities	_	27,625,685	94.38
	_		
Collective Investment Schemes 2.67% (2.84%)			
Baillie Gifford Overseas Growth Funds ICVC - Japanese Fund	41,575	782,450	2.67
		782,450	2.67
Futures 0.08% (-0.07%)			
Mini Topix Jun '24	11	2,688	0.01
Topix Index Jun '24	7	18,803	0.07
		21,491	0.08

as at 30 April 2024

Portfolio of investments	28,429,626	97.13
Net other assets	840,249	2.87
Total net assets	29,269,875	100.00

Figures in brackets represent sector distribution at 31 October 2023.

All equity shares are listed ordinary shares unless otherwise stated.

Collective Investment Scheme securities are not listed and are valued using publicly available market data unless otherwise stated.

Futures securities are derivative instruments listed on recognised exchanges.

### Statistical information (unaudited)

for the six months ended 30 April 2024

	Sterling Accumulation A Shares			
	30.04.2024	31.10.2023	31.10.2022	31.10.2021
Other information				
Closing net asset value (£)	29,269,875	27,932,631	28,002,305	33,716,720
Closing number of shares	9,731,030	10,875,092	12,134,227	13,040,118
Net asset value per shares(p)	300.79	256.85	230.77	258.56
Prices				
Highest share price (p)	317.6	274.4	272.4	286.3
Lowest share price (p)	261.2	237.3	223.2	224.5

### Ongoing Charges Figure (OCF)

The OCF provides investors with a clearer picture of the total annual costs in running a Collective Investment Scheme. The OCF consists principally of the ACD's periodic charge, but also includes the costs for other services paid in respect of Depositary, custody, FCA, taxation services, audit fees and transaction charges. Collectively these fees are known as other expenses.

Expense Type	Period to 30.04.2024	Year to 31.10.2023
Sterling Accumulation A Shares		
ACD's periodic charge	0.65%	0.65%
Other expenses	0.16%	0.12%
Ongoing charges figure*	0.81%	0.77%

\*The current period OCF is annualised based on the fees suffered during the accounting period.

### Financial Statements - Japan Equities (unaudited)

### Statement of total return (unaudited)

### for the six months ended 30 April 2024

	202	4	2023	
	£	£	£	£
Income Net capital gains Revenue Expenses Interest payable and similar charges	375,048 (109,963) (1,415)	4,454,643	490,382 (104,323) (2,419)	1,694,129
Net revenue before taxation Taxation	263,670 (36,700)		383,640 (45,648)	
Net revenue after taxation		226,970		337,992
Total return before distributions	-	4,681,613	_	2,032,121
Distributions		(226,970)		(337,992)
Change in net assets attributable to shareholders from investment activities	-	4,454,643	=	1,694,129

### Statement of change in net assets attributable to shareholders (unaudited)

### for the six months ended 30 April 2024

	202	24	202	3
	£	£	£	£
Opening net assets attributable to shareholders		27,932,631*		28,002,305
Amounts receivable on issue of shares Amounts payable on cancellation of shares	172,490 (3,520,871)		158,108 (1,601,675)	
		(3,348,381)		(1,443,567)
Dilution adjustment		4,011		1,724
Change in net assets attributable to shareholders				
from investment activities		4,454,643		1,694,129
Retained distribution on accumulation shares		226,971		337,992
Closing net assets attributable to shareholders		29,269,875	-	28,592,583*

\* The net assets at the start of the current period do not equal the net assets at the end of the comparative period as they are not consecutive periods.

### Balance sheet (unaudited)

as at 30 April 2024

	30 April 2024 £	31 October 2023 £
Assets:		
Fixed assets:		
Investments	28,429,626	27,583,213
Current assets:		
Debtors	265,808	270,177
Cash and bank balances	612,697	1,589,903
Total assets	29,308,131	29,443,293
Liabilities:		
Investment liabilities	-	(18,139)
Creditors		
Bank overdrafts	-	(1,360,506)
Other creditors	(38,256)	(132,017)
Total liabilities	(38,256)	(1,510,662)
Net assets attributable to shareholders	29,269,875	27,932,631

#### Accounting policies

The interim financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014.

The accounting policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

The distribution policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

## Distribution tables (unaudited)

### for the six months ended 30 April 2024

Distributions on Sterling Accumulation A Shares in pence per share

Payment	Payment	Distribution	Distribution
date	type	payable	paid
		2024	2023
30.06.24	interim	2.3324	2.9273

### Accumulation distributions

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

### Investment commentary

### Merger of Sterling Bond

The ACD wrote to Shareholders on 11 September 2023 to advise them of the proposed Merger of Sterling Bond Fund ("Merging Fund") with Santander Sterling Bond Portfolio. Santander Asset Management UK Limited (SAM UK) acts as Authorised Corporate Director of both Santander Premium Fund and Santander Managed OEIC, of which the Merging Fund and Santander Sterling Bond Portfolio are sub funds of respectively. The Merger was approved after SAM UK called an extraordinary general meeting ("EGM") of the Shareholders of the Merging Fund to vote on whether the Merger should take place. The Merger was implemented on 2 February 2024 (the "Effective Date") and a notice of successful Merger completion issued on 5 February2024.

### **Investment Objective**

The Fund's objective was to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.

The Fund aimed to outperform (after the deduction of fees) the following composite Target Benchmark measured over a rolling 3 year time period: 80% Markit iBoxx GBP Non-Gilts Index TR and 20% FTSE Actuaries UK Conventional Gilts All Stocks TR.

It was expected that average outperformance for the Fund would typically not be greater than 0.10% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling 3 year period, although no level of outperformance was guaranteed.

#### **Investment Policy**

The Fund was actively managed and aimed to achieve its objectives by investing at least 95% in bonds.

The Fund may have invested in:

- between 60-90% in bonds issued by companies, supranationals, and other non-sovereign entities; and
- between 10-40% in bonds issued by governments (typically these will be bonds issued by the UK Government).

It was expected that the Fund would have typically invested at least 65% in bonds issued by companies.

The Fund may have invested in developed markets globally but at least 95% of the Fund's assets were required to be denominated in or Hedged to Pounds Sterling.

The Fund invested in bonds which were, at the time of purchase, investment grade. In addition, up to 10% of the Fund may have been invested in bonds which were, at the time of purchase, sub-investment grade, and up to 5% of the Fund may have been invested in bonds which were, at the time of purchase, unrated (where a Sub-Investment Manager would have determined whether the bonds had quality equivalent to investment grade or sub-investment grade).

The Fund's investment in bonds could have included bonds which were "non-standard" (up to 25% of the Fund, although typically the Fund did not hold more than 5%). These may have been, for example, bonds which were able to make payments earlier than their target maturity date, or had terms where the principal amount of the bond could have been paid back over the

### Investment commentary (continued)

### Investment Policy (continued)

term of the bond, instead of being paid at the bond's maturity date, or asset backed or mortgage backed securities (investments whose return is generated from and backed by a basket of debt, for example mortgages). With regard to asset backed and mortgage backed securities, the Fund's exposure was limited to 10%.

The Fund may have also invested a maximum of 5% in cash, cash like and other money market instruments.

At least 90% of the Fund was invested directly. Up to 10% of the Fund could have been invested indirectly by investing in units of Actively Managed and/or Passively Managed Collective Investment Schemes (which may have been managed by the ACD, any Sub-Investment Manager or other companies, including within the Santander Group).

The Fund may have used Derivatives for Efficient Portfolio Management(including hedging), where Derivatives were used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

#### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD has appointed Sub-Investment Managers to provide investment management services in relation to specified allocations of the assets of the Fund. The proportion of the Fund's assets under the management of each of the ACD and Sub-Investment Managers (each such portion of the Fund a "Mandate") is determined by the ACD. The ACD selects Sub-Investment Managers based on their ability to deliver the relevant outperformance target associated with each Mandate.

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

The Fund is actively managed which means that the ACD and, subject to the investment guidelines agreed with the ACD, each Sub-Investment Manager, will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change, and it will select investments that it believes will best achieve each Mandate's outperformance target. An assessment will be completed, by the ACD or the relevant Sub-Investment Manager, on investment opportunities before investment decisions are made on their respective Mandates.

In respect of the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected. As an example, in respect of each Mandate with a Sub-Investment Manager:

a separate outperformance target is in place for the relevant Sub-Investment Manager to aim for. This target relates
 to outperformance relative to an Index in the Fund's Target Benchmark. However it will be calculated on a different

### Investment commentary (continued)

### Investment Strategy and Process (continued)

basis to the Fund's objective to outperform the Target Benchmark as it will be calculated before, not after, the deduction of the Fund's fees, but this is aligned with the investment objectives of the Fund overall; and

 each Sub-Investment Manager will consider a range of risk management measures (described below) which reference the Target Benchmark. These will be commensurate to any outperformance target (as noted above) in place.

The ACD will manage its Mandate in line with the Fund's objective to outperform the Target Benchmark and is also subject to the Fund level Tracking Error, described below, as a risk management measure.

Although the ACD and each Sub-Investment Manager may have a different investment style or bias, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole is to meet its investment objectives.

#### The ACD has appointed:

- one Sub-Investment Manager to manage Mandates which make up approximately 70% of the Fund. When selecting bonds, it will consider credit risk (the potential risk that issuers of bonds will be unable to honour their payment obligations), and how changing interest rates might impact the value of a bond in order to help determine which bonds to invest in. For example increasing interest rates will usually lower the value of an existing bond, and if the bond has a long time until maturity there could be more of an impact on its value. Therefore the Sub-Investment Manager may choose to reduce a Mandate's sensitivity to a change in interest rates if it expects them to rise or vice versa. When selecting company bonds, it will assess a company with respect to four key factors: industry attractiveness, competitive position, management quality and financial position, to assign a score which it will consider as part of its overall selection process. It will aim to select bonds which it believes are attractively priced and will help the Mandates meet their respective outperformance targets. When selecting Government bonds (typically UK Government bonds) it will use a number of tools to assess the impact of key economic and socio-political factors in order to determine a forward-looking view on the medium and long-term risk that the UK Government may be unable to meet its payment obligations on the bonds. In doing so, it will consider factors such as the UK Government's cash flow;
- one Sub-Investment Manager to manage a Mandate of approximately 21% of the Fund. When selecting bonds, it will consider, among other factors, bond issuers and different sectors and industries and will aim to select bonds which it believes are undervalued and which may deliver attractive investment returns; and
- the ACD manages the remaining approximately 9%. It will invest in Collective Investment Schemes which offer
   indirect exposure to bonds it believes will help the Fund to achieve its investment objectives. The ACD will favour
   Actively Managed Collective Investment Schemes.

On the basis of any individual outperformance target, and risk management measures, relevant to the Mandates, it is expected that average outperformance for the Fund will typically not be greater than 0.10% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three year period. Outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

The Fund's strategy is complemented by the deployment of Derivatives for Efficient Portfolio Management. It is expected that Derivatives will be used regularly in circumstances such as managing risk, for example to manage currency risk by hedging to Pounds Sterling or to manage interest rate risk, or responding quickly to developments in financial markets.

### Investment commentary (continued)

### Investment Strategy and Process (continued)

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of up to 2%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 2% provided this is consistent with the investment strategy of the Fund. The Sub-Investment Managers are also subject to some investment restrictions which reference an Index in the Target Benchmark, relating to issuer credit rating, and the overall average period of time it takes for income and capital of the bonds in the Fund to be paid compared to the Target Benchmark, as part of their investment processes. These are risk management measures.

The risk management measures mean that although the Sub-Investment Managers and the ACD have discretion to select investments for their respective Mandate, the degree to which each Mandate is permitted to deviate from an index in the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. The Sub-Investment Managers and the ACD do not have to invest in the same assets that make up an Index in the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up an Index in the Target Benchmark, but some of the Mandates' investments will reflect the constituents of an Index in the Target Benchmark. The Fund as a whole may, therefore, diverge from the Target Benchmark, and may hold significantly fewer assets than those which make up the Target Benchmark but some of the Fund's investments will reflect constituents of the Target Benchmark.

#### Investment Manager

Santander Asset Management UK Limited

#### Sub-Investment Manager

BlackRock Investment Management(UK) Limited

#### **Risk Profile**

The main risk within the portfolio relates to changes in the prices of securities held. Other risks include: counterparty risk, country risk, liquidity risk and derivatives risk. The Fund does not borrow in the normal course of business.

#### **Risk and Reward Indicator**

Lower Risk	(				ŀ	ligher Risk
Typically L	cally Lower Rewards Typically Higher R			er Rewards		
1	2	3	4	5	6	7

The risk and reward indicator shown above is based on historical data which may not be a reliable indication for the future risk profile of the Fund.

The lowest risk and reward indicator does not mean risk free.

The risk and reward indicator shown is not guaranteed and may change over time.

### Investment commentary (continued)

### Performance

### Capital Growth

Percentage price change from 30 April 2019 to 2 February 2024 (5 years)				
	Cumulative			
Sterling Bond Sterling Accumulation A Shares	-4.42%			
Percentage price change from 30 April 2021 to 2 February 2024 (3 years)				
	Annualised	Cumulative		
Sterling Bond Sterling Accumulation A Shares	-4.61%	-12.21%		
80% Markit iBoxx GBP Non-Gilts Index TR and 20% FTSE Actuaries UK Conventional Gilts All Stocks Index TR*	-4.80%	-13.72%		
Percentage price change from 31 October 2023 to 2 February 2024 (3 months)				
Sterling Bond Sterling Accumulation A Shares	nd Sterling Accumulation A Shares 7.25%			
80% Markit iBoxx GBP Non-Gilts Index TR and 20% FTSE Actuaries UK Conventional Gilts All Stocks Index TR*	5.75%			

Source Lipper - NAV at noon, bid to bid, net of fees, revenue reinvested, primary share class.

Source Factset - Market index returns are based on daily index valuations as at close-of-business of the relevant market and are not subject to fees. Past performance is not a guarantee of future performance. The value of investments and the revenue from them can go down as well as up and investors may not get back the amount originally invested.

\*Please note that the Benchmark was reclassified from Constraint to Target on 7 July 2021. Prior to this date the Fund was not aiming to outperform the Benchmark.

### Investment commentary (continued)

### **Market Review**

The reporting period from 31 October 2023 to 2 February 2024 was a tale of two halves. In November and December, there was a significant rally in government bonds. Ten-year UK government bond (gilt) yields<sup>11</sup> and US government bond (Treasury) yields<sup>12</sup> were lower by around 1 percentage point, driven by falls in inflation and the resulting expectation for interest-rate cuts by the Bank of England (BoE) and US Federal Reserve. As bond yields and prices move inversely to each other, the fall in bond yields meant bond prices rose.

In January, market participants come to the realisation that the rally in government bond markets may have gone too far, with the 10-year gilt yield experiencing its most significant monthly increase since May 2023.

This reversal of views was illustrated by the UK bond market. In December 2023, UK bond investors had forecasted close to 1.7 percentage points of interest-rate cuts from the BoE by the end of 2024. However, by January 2024, this had fallen to around 1 percentage point and fell further by the end of the reporting period.<sup>13</sup>

The moderation in investors' expectations for interest-rate cuts was driven, in part, by more persistent inflationary pressures. Despite falling to 3.9% in November, UK annual consumer prices rose by 4.0% in December and January.<sup>14</sup> However, inflation moderated thereafter, but still came in at a higher-than-expected 3.2% in March.<sup>15</sup>

Nevertheless, BoE policymakers stated towards the end of the period that the recent movements in inflation were more encouraging, but were split on the timing of when interest rates can go down. As a result, investors continued to push out their forecasts for when interest rates will be cut.

Throughout the reporting period, the rate of return on corporate bonds versus comparable government bonds continued to tighten, as investors' demand for global corporate bonds has supported a positive technical backdrop.

#### Performance Review and Investment Activity (Reporting Period)

The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon. The Fund will aim to outperform (after the deduction of fees) the following Target Benchmark measured over a rolling three-year time period: 80% Markit iBoxx GBP Non-Gilts Index TR and 20% FTSE Actuaries UK Conventional Gilts All Stocks.

It is expected that average outperformance for the Fund will typically not be greater than 0.10% per annum (after the deduction of fees) in excess of the Target Benchmark over a rolling three-year period, although no level of outperformance is guaranteed.

The majority of the Fund is actively managed by two separate Sub-Investment Managers. It invests in bonds in developed markets, 60-90% of which are issued by non-sovereign entities and 10-40% of which are issued by governments (typically, the

<sup>&</sup>lt;sup>11</sup> CNBC, 30 April 2024

<sup>&</sup>lt;sup>12</sup> CNBC, 30 April 2024

<sup>&</sup>lt;sup>13</sup> Sub-Investment Manager, 30 April 2024

<sup>&</sup>lt;sup>14</sup> Trading Economics, 30 April 2024

<sup>&</sup>lt;sup>15</sup> Financial Times, 17 April 2024

### Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

UK government). At least 95% of the Fund's investments will be in bonds, at least 65% of which will be bonds issued by companies. At least 95% of the Fund's investments must be denominated in British pounds.

On 02 February 2024, the Fund merged into Santander Sterling Bond Portfolio. As a result, the performance metrics below are for the period to 02 February 2024.

The Fund has produced a cumulative return of -4.42% over the last five years, not achieving its objective to provide a combination of capital growth and income over a period of five or more years.

The Fund's negative performance was mainly due to the 2022 bond crisis caused by the rate hikes and the mini budget announcement by the UK government.

Over the past three years, the Fund cumulatively returned -12.21% (-4.61% annualised). The Fund has met its objective to outperform the Target Benchmark, which cumulatively returned -13.72% (-4.80% annualised).

The outperformance relative to the benchmark was mainly due to the sector and security selection and duration positioning.

The Fund delivered a return of 7.25% in the interim period to 02 February 2024, while the Target Benchmark returned 5.75%.

The Fund maintained a relatively large position in bonds with longer maturity than the Target Benchmark over the period. In particular, the Fund's key position was in UK government bonds, which contributed to returns at the end of 2023. UK government bonds performed well during that period, as weaker labour market and inflation data emerged and the bond market began to predict future rate cuts by the BoE.

From a corporate bond perspective, the Fund held a lower exposure relative to the Target Benchmark during the reporting period. Meanwhile, the rate of return on corporate bonds compared to government bonds continued to tighten. This led to our corporate bond positioning being a small detractor from performance over the period. However, the Fund's selection in particular sectors and companies positively contributed.

The positive sector and security selection was led by the Fund's focus on 'senior' bonds within banks. In the event of a company entering liquidation or bankruptcy, senior bonds are repaid before other lower priority bonds, such as junior bonds. As a result, there is less risk holding senior bonds and more risk holding junior bonds. However, junior bonds generally offer greater potential for a return on investment.

The Sub-Investment Manager's strategy of tactically trading a number of newly issued euro-denominated bonds in sectors correlated with a market recovery, such as utilities and industrials, also benefited the Fund's performance. New corporate bond issuance by companies was strong during the period and the Sub-Investment Manager bought several attractive new issue bonds, which also performed well during the period.

### Investment commentary (continued)

### Performance Review and Investment Activity (Reporting Period) (continued)

From 23 January 2024, the portfolio of the fund was realigned with the portfolio of Santander Sterling Bond Portfolio in order to efficiently implement the Merger on 2 February 2024.

Multi Asset Solutions Team For and on behalf of Santander Asset Management UK Limited June 2024

406,727,857

### Summary of material portfolio changes (unaudited)

for the six months ended 30 April 2024

Total cost of purchases for the period

Purchases	Cost £	Sales	Proceeds £
United Kingdom Gilt 0.625% 2025	8,808,220	Jupiter Strategic Bond Fund	10,730,274
United Kingdom Gilt 0.125% 2028	6,081,625	United Kingdom Gilt 0.625% 2025	10,515,393
United Kingdom Gilt 1.125% 2039	5,697,109	United Kingdom Gilt 0.125% 2028	10,200,806
Kreditanstalt fuer Wiederaufbau 0.875% 2026	4,946,281	United Kingdom Gilt 1.125% 2039	6,976,206
United Kingdom Gilt 4.5% 2034	4,873,884	Kreditanstalt fuer Wiederaufbau 0.875% 2026	5,873,865
United Kingdom Gilt 3.5% 2025	4,782,955	United Kingdom Gilt 3.5% 2025	5,675,218
United States Treasury Inflation Indexed Bonds		United Kingdom Gilt 4.5% 2034	5,327,356
0.75% 2028	3,950,506	HSBC Investment Funds OEIC - Corporate	
UBS 4.125% 2033	3,088,840	Bond Fund	4,863,132
United Kingdom Gilt 0.875% 2046	3,045,405	European Investment Bank 0.875% 2026	4,313,256
Cadent Finance 5.625% 2036	2,911,059	United Kingdom Gilt 0.875% 2046	4,121,613
United Kingdom Gilt 0.625% 2035	2,910,030	United States Treasury Inflation Indexed Bonds	
Dexia 0.25% 2026	2,789,100	0.75% 2028	3,965,322
United Kingdom Gilt 0.375% 2030	2,573,857	Dexia 0.25% 2026	3,939,705
Time Warner Cable 5.75% 2031	2,553,026	United Kingdom Gilt 0.625% 2035	3,892,683
United Kingdom Gilt 4.375% 2054	2,191,824	United Kingdom Gilt 1.25% 2041	3,728,754
Traton Finance Luxembourg 5.625% 2029	2,189,022	United Kingdom Gilt 0.375% 2030	3,398,122
European Investment Bank 0.875% 2026	2,159,667	Time Warner Cable 5.75% 2031	3,184,989
Inter-American Development Bank 3.875%		UBS 4.125% 2033	3,090,223
2029	2,071,224	Cadent Finance 5.625% 2036	2,938,922
United Kingdom Gilt 1.25% 2041	2,004,675	United Kingdom Gilt 1.625% 2028	2,922,671
Inter-American Development Bank 1.25% 2025	1,993,305	United Kingdom Gilt 0.625% 2050	2,736,214

Included within the above, in-specie sales totaling  $\pm 172,322,257$  were made during the period.

229,849,560

Total proceeds from sales for the period

## Portfolio statement (unaudited)

as at 30 April 2024

	Holding or nominal value of positions at	Market value	Percentage of total net assets
Investment	30 April	£	%
Fixed interest securities nil (88.30%)			
AAA to AA nil (9.64%)			
AA- to A+ nil (25.57%)			
A to A- nil (17.07%)			
BBB+ to BBB nil (28.73%)			
Below BBB to unrated nil (7.29%)			
Money Market Securities nil (1.20%)			
Collective Investment Schemes nil (8.43%)			
Futures nil (nil)			
Forward currency trades nil (-0.10%)			
Portfolio of investments		-	
Net other assets		-	-
Total net assets		-	

Figures in brackets represent sector distribution at 31 October 2023.

### Statistical information (unaudited)

### for the six months ended 30 April 2024

	Sterling Accumulation A Shares			
	30.04.2024*	31.10.2023	31.10.2022	31.10.2021
Other information				
Closing net asset value (£)	n/a	170,042,980	188,951,817	263,982,918
Closing number of shares	n/a	64,010,148	72,035,347	80,547,578
Net asset value per shares(p)	n/a	265.65	262.30	327.74
Prices				
Highest share price (p)	n/a	284.0	334.9	340.3
Lowest share price (p)	n/a	259.0	242.5	322.0

\* The Fund closed on 2 February 2024.

#### Ongoing Charges Figure (OCF)

The OCF provides investors with a clearer picture of the total annual costs in running a Collective Investment Scheme. The OCF consists principally of the ACD's periodic charge, but also includes the costs for other services paid in respect of depository,custody, FCA, taxation services, audit fees and transaction charges. Collectively these fees are known as other expenses.

Expense Type	Period to 30.04.2024*	Year to 31.10.2023
Sterling Accumulation A Shares		
ACD's periodic charge	n/a	0.50%
Other expenses	n/a	0.07%
Ongoing charges figure	n/a	0.57%

\*The Fund closed on 2 February 2024.

### Financial Statements - Sterling Bond (unaudited)

## Statement of total return (unaudited)

### for the six months ended 30 April 2024

	202	24	202	3
	£	£	£	£
Income Net capital gains Revenue Expenses Interest payable and similar charges	1,841,604 (237,138) (2,530)	10,903,031	3,298,763 (495,598) (5,509)	4,823,973
Net revenue before taxation Taxation	1,601,936 	-	2,797,656	
Net revenue after taxation		1,601,936	_	2,797,656
Total return before distributions		12,504,967		7,621,629
Distributions		(1,602,806)		(2,797,656)
Change in net assets attributable to shareholders from investment activities		10,902,161	=	4,823,973

### Statement of change in net assets attributable to shareholders (unaudited)

### for the six months ended 30 April 2024

	2024		2023	
	£	£	£	£
Opening net assets attributable to shareholders Amounts payable on Termination	(347)	170,042,980*		188,951,817
Amounts receivable on issue of shares Amounts payable on cancellation of shares Amounts payable on in-specie transfer	(5,366,130) (177,192,304)		1,637,008 (12,222,088) -	
		(182,558,781)		(10,585,080)
Dilution adjustment		10,834		25,162
Change in net assets attributable to shareholders				
from investment activities		10,902,161		4,823,973
Retained distribution on accumulation shares		1,602,806		2,797,656
Closing net assets attributable to shareholders		-		186,013,528*

\* The net assets at the start of the current period do not equal the net assets at the end of the comparative period as they are not consecutive periods.

### Balance sheet (unaudited)

as at 30 April 2024

	30 April 2024 £	31 October 2023 £
Assets:		
Current assets:		
Investments*	-	166,666,563
Debtors	155,303	3,859,523
Cash and bank balances		14,458,535
Total assets	155,303	184,984,621
Liabilities:		
Investment liabilities	-	(313,655)
Creditors		
Bank overdrafts	(137,130)	(12,321,739)
Other creditors	(18,173)	(2,306,247)
Total liabilities	(155,303)	(14,941,641)
Net assets attributable to shareholders		170,042,980

### Accounting policies

\*The ACD is of the opinion that it is not appropriate to adopt the going concern basis in the preparation of the financial statements for the Sterling Bond sub-fund due to the merger of the sub-fund with the Santander Sterling Bond Portfolio.

The interim financial statements have been prepared in compliance with FRS 102 and in accordance with the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014.

The accounting policies applied are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

The distribution policies applied up to the point of closure are consistent with those of the annual financial statements for the year ended 31 October 2023 and are described in those financial statements.

### Distribution tables (unaudited)

### for the period from 1st November 2023 to 2nd February 2024 (date of closure)

The Fund made a special distribution based on income available up to the point of closure and this was paid to shareholders on 2nd April 2024.

Gross interest distributions on	Chaulin - A second - Lakisus	A Channa in manage management
Grace inforder diefrinitriane an	SEPTIDO ACCIMULATION	A Sharos in honco hor sharo

Payment	Payment	Distribution	Distribution
date	type	payable	paid
		2024	2023
02.04.24	special	2.5820	n/a
30.06.24	interim	n/a	4.1049

#### Accumulation distributions

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

### Further information

#### **Report and Accounts**

Copies of annual and half-yearly long reports may be requested from the ACD or inspected at FNZ TA Services Ltd, Level 7, 2 Redman Place, Stratford, London E20 1JQ, United Kingdom.

The annual accounting period for the Company ends each year on 31 October, and the interim reporting period ends on 30 April.

The annual reports of the Company are published on or before 28 February and half yearly reports by 30 June each year.

#### Share Classes

Fund	Share Classes	ACD's annual management charge
UK Equities	Sterling Accumulation A Shares	0.65%
Europe Ex UK Equities	Sterling Accumulation A Shares	0.65%
United States Equities	Sterling Accumulation A Shares	0.65%
Japan Equities	Sterling Accumulation A Shares	0.65%

Income attributable to accumulation Shares is automatically added to the capital assets of the relevant Fund at the end of each monthly, quarterly interim and annual accounting period (depending on the distribution frequency of the relevant Fund) and is reflected in the relevant Share price. Income attributable to income Shares will be paid on the distribution dates as specified in the Prospectus.

Each Class may attract different charges and expenses and so monies may be deducted from the scheme property attributable to such Classes in unequal proportions. In these circumstances, the proportionate interests of the Classes within a Fund will be adjusted accordingly.

Further Classes may be established from time to time by the ACD with the agreement of the Depositary, and where relevant the approval of the FCA, and in accordance with the Instrument of Incorporation. On the introduction of any new Fund or Class, a revised prospectus will be prepared as soon as reasonably practical, setting out the details of such new Fund or Class.

#### **Minimum Investment**

The minimum initial investment that can be made to the Sterling Accumulation A share class is £250.

The minimum subsequent investment that can be made to the Sterling Accumulation A share class is £1.50.

The minimum withdrawal that can be made from the Sterling Accumulation A share class is £1.50.

The minimum holding that must remain in the Sterling Accumulation A share class is £250.

#### **Voting Rights**

Every Shareholder who (being an individual) is present in person, or (being a corporation) by its properly authorised representative, shall have one vote on a show of hands. A Shareholder may vote in person or by proxy on a poll vote, and any Shareholder entitled to more than one vote need not use all his votes or cast all the votes he uses in the same way.

#### Voting Rights (continued)

For some resolutions, for example to approve certain amendments to the Instrument of Incorporation, an extraordinary resolution is required. For an extraordinary resolution to be passed, at least 75% of the votes cast at the meeting must be in favour of it.

For other resolutions, an ordinary resolution is required. For an ordinary resolution to be passed, more than 50% of the votes cast at the meeting must be in favour of it.

The rights attached to a Class may only be varied in accordance with the FCA Regulations.

The ACD will not be counted in the quorum for a meeting. The ACD and its associates are not entitled to vote at any meeting, except in respect of Shares which the ACD or an associate holds on behalf of or jointly with a person who, if itself the registered Shareholder, would be entitled to vote and from whom the ACD or its associate has received voting instructions.

Shareholders for the purposes of attending and voting at a meeting means those on the date seven days before the notice of the relevant meeting was sent out, but excludes holders those who are known to the ACD not to be Shareholders at the time of the meeting.

Any joint Shareholders may vote provided that if more than one joint holder of a Share votes, the most senior joint Shareholder in the Register who tenders a vote, whether in person or by proxy, shall be accepted to the exclusion of the votes of the other joint Shareholder.

#### Winding Up of the Company or Terminating a Fund

The Company may not be wound up except:

- by the court, as an unregistered company under Part V of the Insolvency Act 1986; or
- if the Company is solvent, under the provisions of the FCA Regulations.

To wind up the Company under the FCA Regulations, the ACD has to notify the FCA of the proposal, confirming that the Company will be able to meet all its liabilities within the following 12 months.

Under the FCA Regulations the Company must be wound up or a Fund terminated:

- (a) if an extraordinary resolution is passed to that effect;
- (b) if the FCA agrees to a request by the ACD for revocation of the order in respect of the winding up of the Company or termination of a Fund (provided no material change in any relevant factor occurs prior to the date of the relevant revocation);
- (c) on the occurrence of an event specified in the Instrument of Incorporation as triggering a winding up of the Company or termination of a Fund;
- (d) when the period (if any) fixed for duration of the Company or a particular Fund by the Instrument of Incorporation expires or any event occurs on the occurrence of which the Instrument of Incorporation provides that the Company is to be wound up or a particular Fund terminated (for example if the Net Asset Value of a Fund is less than £5,000,000 at any time more than one year after the first issue of Shares in that Fund);

#### Winding Up of the Company or Terminating a Fund (continued)

- (e) in the case of the Company, on the effective date of a duly approved scheme of arrangement which is to result in the Company ceasing to hold any scheme property;
- (f) in the case of a Fund, on the effective date of a duly approved scheme of arrangement which is to result in the Fund ceasing to hold scheme property; or
- (g) on the date when all Funds fall within (f) above or have otherwise ceased to hold any scheme property,
   notwithstanding that the Company may have assets and liabilities that are not attributable to any particular Fund.

On the occurrence of any of the above:

- FCA Regulations relating to dealing, valuation, pricing, investment and borrowing will cease to apply to the Company or the Fund;
- the Company will cease to issue and cancel Shares in the Company or the Fund;
- the ACD will cease to sell or redeem Shares or arrange for the Company to issue or cancel them for the Company or the Fund;
- no transfer of Shares will be registered and no change to the Register will be made without the sanction of the ACD.
- where the Company is to be wound up, it will cease to carry on its business except as is required for its beneficial winding up; and
- the corporate status and corporate powers of the Company and (subject to the provisions above) the powers of the ACD continue until the Company is dissolved.

The ACD will, as soon as practicable after the Company or the Fund falls to be wound up or terminated (as appropriate) realise the assets and meet the liabilities of the Company or the Fund and, after paying out or retaining adequate provision for all liabilities properly payable and retaining provision for the costs of winding up or termination, arrange for the Depositary to make one or more interim distributions out of the proceeds to Shareholders proportionately to their rights to participate in the property of the Company or the Fund.

If the ACD has not previously notified Shareholders of the proposals to wind up the Company or to terminate the Fund, it will, as soon as practicable after the commencement of the winding up of the Company or termination of the Fund, give written notice of this commencement to Shareholders. When the ACD has caused all of the relevant property and all of the liabilities of the Company or the particular Fund to be realised, it will arrange for the Depositary to make a final distribution to Shareholders on or prior to the date on which the final account is sent to Shareholders of any balance remaining in proportion to their holdings in the Company or a particular Fund.

As soon as reasonably practicable after completion of the winding up of the Company or the termination of a particular Fund, the Depositary will notify the FCA that the winding up or termination has been completed.

Following the completion of a winding up of the Company or termination of a Fund, the ACD must prepare a final account showing how the winding up or termination took place and how the property was distributed. The Auditors will make a report in respect of the final account stating their opinions as to whether it has been properly prepared. This final account and the Auditors' report on it must be sent to the FCA and to each affected Shareholder (or the first named of joint Shareholders) within four months of the completion of the winding up or termination.

### Winding Up of the Company or Terminating a Fund (continued)

As the Company is an umbrella company, each Fund has a specific segregated portfolio of assets and any liabilities attributable or allocated to a particular Fund shall be met out of the property attributable, or allocated to, that particular Fund. Accordingly, the assets of each Fund belong exclusively to that Fund and shall not be used to discharge directly or indirectly the liabilities of, or claims against, any other person or body, including the Company or any other Fund, and shall not be available for any such purpose. Any liabilities, expenses, costs or charges which are not attributable to one Fund only and allocated in accordance with the FCA Regulations, may be re-allocated by the ACD provided that such re-allocation shall be done in a manner which is fair to Shareholders generally.

#### Dealing

The ACD's delegate, FNZ TA Services Limited, is available to deal with requests from institutional investors to buy, redeem (sell) or switch Shares between 9am and 5pm on each Business Day.

Such applications and instructions may be made by post or electronic means where available. The Shares are bought, sold or switched at a forward price, being the price determined at the next valuation of the property of the relevant Fund after the receipt by FNZ TA Services Limited of the investor's instructions.

Subject to the ACD's internal approvals for new investors including the anti-money laundering measures:

- valid requests received prior to the relevant Fund's Dealing Cut-Off are dealt at the next Valuation Point;
- if valid requests are received after the Fund's Dealing Cut-Off, they are marked at the subsequent Valuation Point(normally the next Business Day); and
- valid requests are processed at the next applicable Valuation Point following receipt of the requestbefore the Dealing Cut-Off, except in the case where dealing in a Fund has been deferred or suspended.

The Funds have different Dealing Cut-Off points as set out below:

- For the UK Equities and Europe Ex UK Equities, the Dealing Cut-Off is 12 noon;
- For Japan Equities, the Dealing Cut-Off is 6am; and
- For United State Equities, the Dealing Cut-Off is 9pm (the day prior to the relevant Valuation Point).

Please refer to the Prospectus for further information.

#### Pricing and dilution adjustment

Shares are priced on a single mid-market pricing basis in accordance with the FCA Regulations.

The price of a Share is the Net Asset Value attributable to the relevant Class divided by the number of Shares of that Class in issue.

The Net Asset Values attributable to each Class of each Fund will normally be calculated at 12 noon UK time on each Business Day.

The ACD reserves the right to revalue a Class or Fund at any time at its discretion.

For the purpose of calculating the price at which Shares in a Fund are to be issued or sold, the values of investments are calculated by using mid-market prices. The actual cost of buying or selling a Fund's investments maybe higher or lower than

#### Pricing and dilution adjustment (continued)

the mid-market values used in calculating the Share price, for example due to dealing charges or through dealing at prices other than the mid-market price. Under certain circumstances this will have an adverse effect on the continuing Shareholders in a Fund. This effect is called "dilution".

For the purpose of reducing dilution in a Fund, the ACD may make a dilution adjustment to the price of a Share so that it is above or below that which would have resulted from a mid-market valuation of the Fund's investments. This will give a more accurate value of the actual price paid or received.

A dilution adjustment will be applied where a Fund is experiencing issues and redemptions of Unit on an aggregated basis. The dilution adjustment is calculated by reference to the costs of dealing in the underlying investments of the relevant Fund, including any dealing spreads, commissions and transfer taxes.

As dilution is directly related to the issues and sales of Shares in a Fund, it is not possible to predict accurately whether dilution will occur at a future point in time or how frequently however, based on historical data, the ACD expects to make a dilution adjustment on most occasions when Shares are issued or redeemed. A typical adjustment, based on historical data, is expected to be between 0% and 2% for the issue and redemption of Shares.

Please refer to the Prospectus for further information.

#### OCF Cap

A Fund may operate with an "OCF cap" in respect of one or more of its Share Classes. This means that the ongoing charges figure ("OCF") the Share Class is subject to is set at a fixed maximum amount.

Where a Share Class has an OCF cap, if the costs which are included in the OCF calculation exceed the amount of the cap then the ACD will pay any excess out of its own resources. Where the OCF calculation is equal to or below the OCF cap, the Share Class will pay this amount.

#### Taxation

The Funds pay corporation tax at 20% on their taxable income less expenses and are generally exempt from capital gains tax.

Where a Fund pays dividend distributions, these are paid without any deduction of tax. The first £1,000 of dividends, including dividend distributions from a Fund, paid to an individual (or, in the case of accumulation Shares, retained in a Fund and reinvested) in any tax year are tax-free (the dividend allowance). Where an individual's total dividends from all sources paid or treated as paid to an individual are more than the dividend allowance in a tax year, then the amount over the allowance is taxable at dividend tax rates which depend on the individual's circumstance.

A Fund which is over 60% invested in interest paying investments for the whole of its distribution period can pay interest distributions, these are generally known as 'bond funds'. The only Fund which is currently a bond fund is Sterling Bond. Individuals are entitled to a personal savings allowance each tax year, if an individual utilises their annual allowance they could be liable to pay additional tax on the gross distribution.

A distribution received by a shareholder liable to corporation tax is received as franked revenue to the extent that the revenue of the Fund consists of franked revenue. The balance of the distribution is received as an annual payment from which tax has been deducted at the basis rate.

#### Taxation (continued)

Your tax voucher will indicate the appropriate rate of tax depending on whether interest or dividend distributions apply.

Please refer to the Prospectus for further information.

#### **Risk Warnings**

Please note that past performance is not necessarily a guide to the future. The price of Units and any income from them can fall as well as rise and you may not get back the amount you originally invested. Significant changes in interest rates could also affect the value of your investment and any foreign investments will be affected by fluctuations in rates of currency exchange. Investment in a Fund should generally be viewed as a long-term investment. **Please refer to the Key Investor Information Document for a fuller explanation of the risk warnings.** The most recent Key Investor Information Document may be obtained by visiting www.santanderassetmanagement.co.uk. Santander Asset Management UK Limited only provides information about its own products and will not give individual independent advice. Should you wish to seek advice, then please contact an Independent Financial Adviser.

### Appointments

### Authorised Corporate Director (ACD), Registrar and Investment Manager

Santander Asset Management UK Limited 287 St Vincent Street Glasgow G2 5NB, United Kingdom Authorised and regulated by the Financial Conduct Authority

### Directors

Richard Royds Dr Jocelyn Dehnert Lazaro de Lazaro Torres Pak Chan (resigned 10 June 2024) Jacqueline Hughes Miguel Angel Sanchez Lozano Cassandra Waller (appointed 15 May 2024)

### Sub-Investment Managers

Aegon Asset Management UK Plc (retired 26 April 2024) 3 Lochside Crescent Edinburgh EH12 9SA, United Kingdom Authorised and regulated by the Financial Conduct Authority

Allianz Global Investors Europe GmbH UK Branch 155 Bishopsgate London EC2M 3TY, United Kingdom Authorised and regulated by the Financial Conduct Authority

Amundi Japan Ltd 1-9-2, Higashi-Shimbashi Minato-ku Tokyo Japan Authorised by the Financial Services Agency of Japan

BlackRock Investment Management (UK) Limited 12 Throgmorton Avenue London EC2N 2DL, United Kingdom Authorised and regulated by the Financial Conduct Authority

Goldman Sachs Asset Management International Peterborough Court 133 Fleet Street London EC4A 2BB United Kingdom Authorised and regulated by the Financial Conduct Authority

### Appointments (continued)

### Sub-Investment Managers (continued)

Santander Asset Management S.A., SGIIC Calle Serrano 69 - 28006 Madrid Spain Registered with the Commercial Registry of Madrid and with the Administrative Registry of the Spanish Commission of the Stock Market of Collective Investment Institutions Management Companies

Schroder Investment Management Limited 1 London Wall Place London EC2Y 5AU, United Kingdom Authorised and regulated by the Financial Conduct Authority

Western Asset Management Company Limited 10 Exchange Square Primrose Street London EC2A 2EN, United Kingdom Authorised and regulated by the Financial Conduct Authority

#### Depositary

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

#### **Independent Auditors**

PricewaterhouseCoopers LLP Chartered Accountants and Statutory Auditors 141 Bothwell St, Glasgow G2 7EQ

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