

**MONTANARO SMALLER COMPANIES PLC**

**ANNUAL REPORT  
AND  
AUDITED FINANCIAL STATEMENTS**

**FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2022**

An open-ended umbrella variable capital investment company with segregated liability between funds authorised by the Central Bank of Ireland under the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (as amended).

**Registered Number:** 330162

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## MONTANARO SMALLER COMPANIES PLC

### MANAGEMENT AND OTHER INFORMATION

#### Directors

Gavin Caldwell (Irish)\* (Chairman)<sup>†</sup>  
Cedric Durant des Aulnois (French)  
Lisa Martensson (Swedish)\*<sup>†</sup>  
Matthew Francis (British)  
John Ensor (British)\*\*

#### Manager

KBA Consulting Management Limited\*\*\*  
35 Shelbourne Road  
Ballsbridge  
Dublin  
D04 A4E0  
Ireland

#### Investment Manager

Montanaro Asset Management Limited  
53 Threadneedle Street  
London EC2R 8AR  
United Kingdom

#### Independent Auditor

Deloitte Ireland LLP  
29 Earlsfort Terrace  
Dublin 2, D02 AY28  
Ireland

#### Depository

The Bank of New York Mellon SA/NV, Dublin Branch  
Riverside II  
Sir John Rogerson's Quay  
Grand Canal Dock  
Dublin 2  
Ireland

#### Legal Advisor

*As to UK & US Law*  
Vedder Price LLP  
4 Coleman Street  
London EC2R 5AR  
United Kingdom

#### Administrator

BNY Mellon Fund Services (Ireland) Designated Activity  
Company  
One Dockland Central  
Guild Street  
IFSC  
Dublin 1  
Ireland

#### Legal Advisor\*\*\*\*

*As to Irish Law*  
A&L Goodbody LLP  
3 Dublin Landings  
North Wall Quay  
IFSC  
Dublin 1  
Ireland

#### Secretary\*\*\*\*

Goodbody Secretarial Limited  
3 Dublin Landings  
North Wall Quay  
IFSC  
Dublin 1  
Ireland

#### Registered Office\*\*\*\*

Goodbody Secretarial Limited  
3 Dublin Landings  
North Wall Quay  
IFSC  
Dublin 1  
Ireland

#### Swiss Representative Office

Waystone Fund Services (Switzerland) SA  
Avenue Villamont 17  
1005 Lausanne  
Switzerland

#### Swiss Paying Agent

NPB New Private Bank Ltd  
Limmatquai 1 am Bellevue  
Post Box  
8024 Zurich  
Switzerland

#### Listing Sponsor

Matheson  
70 Sir John Rogerson's Quay  
Dublin 2  
Ireland

\*Independent non-executive Directors.

<sup>†</sup>Irish Resident.

\*\*Alternate Director for Matthew Francis.

\*\*\*Effective 12 December 2022, the address of the Manager, changed from 5 George's Dock, IFSC, Dublin 1, Ireland, Ireland to 35 Shelbourne Road, Ballsbridge, D04 A4E0, Ireland.

\*\*\*\*Effective 1 September 2022, the address of the Legal Advisor, Secretary and Registered Office changed from North Wall Quay, IFSC, Dublin 1, Ireland to 3 Dublin Landings IFSC, North Wall Quay, IFSC, Dublin 1, Ireland.

## **MONTANARO SMALLER COMPANIES PLC**

### **DIRECTORS' REPORT**

#### **STATEMENT OF DIRECTORS' RESPONSIBILITIES**

The Directors present, herewith, their annual report for the financial year ended 31 December 2022.

The Directors are responsible for preparing the annual report and financial statements in accordance with applicable Irish Law and General Accepted Accounting Practice in Ireland including the accounting standards issued by the Financial Reporting Council and promulgated by the Institute of Chartered Accountants in Ireland (Generally Accepted Accounting Practice in Ireland), including FRS 102: "The Financial Reporting Standard applicable in the United Kingdom and the Republic of Ireland".

Irish Company law requires the Directors to prepare financial statements for each financial year, which give a true and fair view of the state of affairs of Montanaro Smaller Companies Plc (the "Company") and the profit or loss of the Company for that financial year. In preparing the financial statements, the Directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state whether the financial statements have been prepared in accordance with applicable accounting standards and identify the standards in question, subject to any material departures from those standards being disclosed and explained in the notes to the financial statements; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Company will continue in business.

The Directors confirm that they have complied with the above requirements in preparing the financial statements.

The Directors are responsible for keeping adequate accounting records which disclose with reasonable accuracy at any time the financial position of the Company and to enable them to ensure that the financial statements are prepared in accordance with FRS 102 and comply with Irish Statute comprising the Companies Act 2014 (the "Companies Act"), the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (as amended) (the "UCITS Regulations") and the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2019, (the "Central Bank UCITS Regulations") and the Euronext Dublin Code of Listing Requirements and Procedures for Investment Funds. They are also responsible for safeguarding the assets of the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The financial statements are published at [www.montanaro.co.uk](http://www.montanaro.co.uk). The Directors together with the Investment Manager are responsible for the maintenance and integrity of the corporate and financial information included on the Company's website as far as it relates to the Company. Legislation in the Republic of Ireland governing the presentation and dissemination of the financial statements may differ from legislation in other jurisdictions.

#### **Audit Information Statement**

The Directors confirm that:

- so far as the Directors are aware, there is no relevant audit information of which the Company's statutory auditors are unaware, and
- the Directors have taken all the steps that they ought to have taken as Directors in order to make themselves aware of any relevant audit information and to establish that the Company's statutory auditors are aware of that information.

#### **Directors' Compliance Statement**

The Directors acknowledge that they are responsible for securing the Company's compliance with the relevant obligations as set out in Section 225 of the Companies Act.

The Directors confirm that:

- a compliance policy document has been drawn up that sets out policies, that in their opinion are appropriate to the Company, confirming compliance by the Company with its relevant obligations.
- appropriate arrangements or structures are in place that are, in their opinion, designed to secure material compliance with the Company's relevant obligations, and
- during the financial year, the arrangements or structures referred to above have been reviewed.



## MONTANARO SMALLER COMPANIES PLC

### DIRECTORS' REPORT (continued)

#### Background

The Company was incorporated in Ireland on 14 July 2000 under registered number 330162 as an open-ended, umbrella-type investment Company with variable capital and segregated liability under the Companies Act. On 29 November 2000, it was authorised by the Central Bank of Ireland (the “Central Bank”) in accordance with the provisions of the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (as amended) as an undertaking for collective investment in transferable securities (“UCITS”).

The Company is constituted as an umbrella fund insofar as the share capital of the Company is divided into different series of Shares with each series of Shares representing a separate portfolio of assets which will comprise a separate sub-fund (a “Fund”) of the Company. Shares of any particular Fund may be divided into different Classes of Shares (“Classes”) to accommodate differing characteristics attributable to each such different Class of Shares.

A separate portfolio of assets will be maintained for each Fund and will be invested in accordance with the investment objective and strategies applicable to the particular Fund. As the Company has segregated liability since 16 June 2016 between its Funds, any liability incurred on behalf of or attributable to any Fund shall be discharged solely out of the assets of that Fund.

The Funds were registered for marketing in the following countries:

<b>Funds/Share Classes</b>	<b>Countries of Registration</b>	
<b>Montanaro European Smaller Companies Fund (All Share Classes)</b>	Ireland	United Kingdom
Additional registration of Share Class:	Italy (Institutional Investors only)	
	Switzerland	
Euro Accumulation Class	Austria	Iceland
	Belgium	Netherlands
	Finland	Norway
	France	Spain
	Germany	Sweden
Euro Class	Austria	Netherlands
	Finland	Norway
	France	Spain
	Germany	Sweden
	Iceland	
Euro Institutional Accumulation Class	Netherlands	
Euro Institutional Distribution Class	Finland	Netherlands
	France	Norway
	Germany	Spain
	Iceland	Sweden
Swedish Krona Accumulation Class	Norway	Sweden
<b>Montanaro UK Income Fund (All Share Classes)</b>	Ireland	United Kingdom
Additional registration of Share Class:		
Euro Class	Iceland	Spain
	France	
Euro Seed Class	France	
Sterling Accumulation Class	Spain	
Sterling Class	France	Spain
Sterling Seed Class	France	
<b>Montanaro European Income Fund (All Share Classes)</b>	Ireland	United Kingdom
Additional registration of share Class:		
Euro Class	Iceland	
Sterling Class	Iceland	

## MONTANARO SMALLER COMPANIES PLC

### DIRECTORS' REPORT (continued)

#### Background (continued)

The Funds were registered for marketing in the following countries (continued):

<b>Montanaro European MidCap Fund (All Share Classes)</b>	Finland	Sweden
	France	Switzerland
	Ireland	United Kingdom
<b>Montanaro Global Innovation Fund (All Share Classes)</b>	Finland	Sweden
	Ireland	United Kingdom
<b>Montanaro Better World Fund</b> Additional registration of Share Class:	Ireland	United Kingdom
Euro Accumulation Class	Denmark France	Spain
Euro Distribution Class	Denmark Finland France Iceland Italy (Institutional Investors only)	Netherlands Norway Spain Sweden
Sterling Distribution Class	Finland	Iceland
	France	Netherlands
	Italy (Institutional Investors only)	Sweden
Swedish Krona Institutional Accumulation Class	Sweden	

#### Right to Publicly Market Shares in Germany

According to Sec. 310 German Capital Investment Code (Kapitalanlagegesetzbuch, KAGB) the Company has notified the Bundesanstalt für Finanzdienstleistungsaufsicht ("BaFin") (Federal Institute for the Supervision of Financial Services) of its intention to publicly distribute Shares in Germany. The Company has the right to publicly distribute Shares in Germany upon completion of the notification process. The following Share Classes of the Montanaro European Smaller Companies Fund may be marketed to investors in Germany:

- Euro Accumulation Class
- Euro Class
- Euro Institutional Distribution Class

No notification has been filed with BaFin for the remaining Classes of the Montanaro European Smaller Companies Fund (Euro Institutional Accumulation Class, Sterling Class, Sterling Institutional Distribution Class, Swedish Krona Accumulation Class and US Dollar Class), Montanaro UK Income Fund, Montanaro European Income Fund, Montanaro European MidCap Fund, Montanaro Global Innovation Fund and Montanaro Better World Fund.

#### Results for the financial year ended 31 December 2022

The results for the financial year are set out in the Statement of Comprehensive Income on pages 35 and 36 and the Statement of Financial Position of the Company is set out on pages 31 and 32.

As at 31 December 2022, the Net Asset Value ("NAV") of the Company was €2,125,206,818 (31 December 2021: €3,229,256,955).

#### Business Review and Future Developments

The Company's business activities together with the factors likely to affect its future development, performance and position are set out in the Performance Summary on pages 11 to 15. In addition, the Investment Manager's Review on pages 16 to 21 sets out the objectives of each Fund.

#### Environmental, Social and Governance Considerations

The sub-funds of Montanaro Smaller Companies Plc promote environmental and/or social characteristics and are therefore subject to the sustainability-related disclosure rules set out in Article 8 of the EU Sustainable Finance Disclosure Regulation ("SFDR"), while Montanaro Better World Fund is subject to the sustainability-related disclosure rules set out in Article 9 of the EU SFDR.

## MONTANARO SMALLER COMPANIES PLC

### DIRECTORS' REPORT (continued)

#### Environmental, Social and Governance Considerations (continued)

Further information about the environmental and/or social characteristics of the sub-funds are set out in the SFDR unaudited appendix to the financial statements on page 99 to 163.

#### Dividends and Distributions

The following distributions were paid during the financial years ending 31 December 2022 and 31 December 2021:

Fund	31 December 2022	31 December 2021
Montanaro European Smaller Companies Fund	€Nil	€Nil
Montanaro UK Income Fund	£18,698,974	£18,148,289
Montanaro European Income Fund	€5,545,967	€4,515,443
Montanaro European MidCap Fund	€Nil	€Nil
Montanaro Global Innovation Fund	€Nil	€Nil
Montanaro Better World Fund	€Nil	€Nil

For the financial year ended 31 December 2022 all distributions were paid out of income apart from distributions of £267,424 on the Montanaro UK Income Fund and distributions of €405,345 on the Montanaro European Income Fund. For the financial year ended 31 December 2021 all distributions were paid out of income apart from distributions of £458,426 on the Montanaro UK Income Fund and distributions of €521,725 on the Montanaro European Income Fund.

The following distributions in respect of the financial year ending 31 December 2022 were approved by the Directors in 2023.

#### Ex-Date of 30 January 2023:

##### Montanaro UK Income Fund

Share Class	Rate per Share	Distribution
Euro Class	€0.007093	€11,601
Euro Seed Class	€0.010671	€8,367
Sterling Class	£0.009422	£1,654,392
Sterling Seed Class	£0.017412	£2,167,261

##### Montanaro European Income Fund

Share Class	Rate per Share	Distribution
Euro Class	€0.007327	€98,617
Sterling Class	£0.016281	£675,109

#### Directors

The Directors of the Company as at 31 December 2022 are stated on page 1.

#### Directors' & Secretary's Interests

Cedric Durant des Aulnois, a Director of the Company, held 2,919 (31 December 2021: 2,919) Shares in the Montanaro UK Income Fund as at 31 December 2022.

No other Directors, nor the Secretary, had any interest in the Shares or deferred Shares of the Company as at 31 December 2022 and 31 December 2021.

No other Director of the Company had at any time during the financial year a material interest in any contract of significance, existing during or at the end of the financial year, in relation to the business of the Company.

#### Directors' Remuneration

Each Director shall be entitled to such remuneration for his or her services as the Directors may determine provided that the aggregate emoluments of all Directors in respect of any twelve month period shall not exceed £120,000 (31 December 2021: £120,000) plus out of pocket expenses, or such higher amount as may be approved by the Company at a general meeting.

#### Cross Liability Risk

Other Funds may be introduced by the Company from time to time, with the prior approval of the Central Bank. As the Company has segregated liability between its Funds, any liability incurred on behalf of or attributable to any Fund shall be discharged solely out of the assets of that Fund.

## **MONTANARO SMALLER COMPANIES PLC**

### **DIRECTORS' REPORT (continued)**

#### **Accounting Records**

The Directors are responsible for ensuring that adequate accounting records, as outlined in Section 281 to 285 of the Companies Act, are kept by the Company. To achieve this, the Directors have delegated the administration of the books and records to BNY Mellon Fund Services (Ireland) Designated Activity Company (the "Administrator"). The Company's accounting records are maintained at the office of the Administrator at One Dockland Central, Guild Street, IFSC, Dublin 1, Ireland.

#### **Risk Management, Objectives and Policies, Uncertainties**

The main risks arising from the Company's financial instruments are market price, liquidity, credit/counterparty and foreign currency risk.

A detailed explanation of the risks to which the Company is exposed and the financial instruments utilised is provided in Note 8 to the financial statements.

The investment objectives of the Funds are set out in the Investment Manager's review and Note 8 to the financial statements.

There can be no assurance that the Funds will achieve their investment objectives. The value of Shares may rise or fall as the capital value of the securities in which the Funds invest may fluctuate.

The Company's overall risk management policy focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the Funds' financial performance.

#### **Impact of Russia Ukraine Conflict**

The invasion of Ukraine by Russia on 24 February 2022 has created extensive uncertainty on the political and economic front with sanctions being imposed on Russia and allies such as Belarus. The Directors, the Manager and the Investment Manager continue to monitor the sanctions activity globally to ensure the portfolios are in adherence. Currently the Funds are not exposed to Russian or Ukrainian assets, nor any other sanctioned holdings. The Directors, the Manager and the Investment Manager, in conjunction with the Administrator, monitor the investor base with respect to sanctions and, if any sanctioned investors are identified, will ensure timely remediation in line with appropriate policies and procedures in place.

#### **Going Concern**

The Company has considerable financial resources in the form of highly liquid investments and cash balances. As a consequence, the Directors believe that the Company is well placed to manage its business risks successfully despite the current uncertain economic outlook.

After making enquiries, the Directors have a reasonable expectation that the Company has adequate resources to continue in operational existence for the foreseeable future. Accordingly, they continue to adopt a going concern basis in preparing the financial statements.

#### **Events during the Financial Year**

Please refer to Note 16 Events during the Financial Year on page 67.

#### **Events since the Financial Year End**

Please refer to Note 17 Events since the Financial Year End on page 68.

#### **Independent Auditor**

The Independent Auditor, Deloitte Ireland LLP, was appointed by Montanaro Smaller Companies Plc on 19 August 2021. Deloitte Ireland LLP have indicated their willingness to continue in office in accordance with Section 383 (2) of the Companies Act.

#### **Audit Committee**

The Directors are aware of Section 167 of the Companies Act which require certain companies to establish an audit committee. The Company as a Public Interest Entity and a UCITS is exempted by Regulation 115 of the 2016 Audits Regulations from establishing an audit committee.

#### **Connected Persons**

Regulation 43 of the Central Bank UCITS Regulations "Restrictions of transactions with connected persons" states that "A responsible person shall ensure that any transaction between a UCITS and a connected person is conducted a) at arm's length; and b) in the best interest of the unitholders of the UCITS".

**DIRECTORS' REPORT (continued)**

**Connected Persons (continued)**

As required under Central Bank UCITS Regulation 82(4), the Directors, as responsible persons, are satisfied that there are in place arrangements, evidenced by written procedures, to ensure that the obligations that are prescribed by Regulation 43(1) are applied to all transactions with a connected person; and all transactions with a connected person that were entered into during the financial period to which the report relates complied with the obligations that are prescribed by Regulation 43(1).

**Board Diversity**

The Board considers that diversity in its membership is beneficial and therefore seeks to ensure that the Board's size, structure and composition, including skills, knowledge, experience and diversity is sufficient for the effective direction and control of the Company.

**Corporate Governance Statement**

***General Principles***

The Company is required to comply with the requirements of the Companies Act, the UCITS Regulations and the Central Bank UCITS Regulations.

The European Communities Directive (2006/46/EC) Regulations (S.I. 450 of 2009 and S.I. 83 of 2010) (the "Regulations") requires the inclusion of a corporate governance statement in the Directors' Report.

In the financial year under review, there was no specific statutory corporate governance code applicable to Irish collective investment schemes whose Shares are admitted to trading on the Irish Stock Exchange Plc trading as 'Euronext Dublin'. However, the Company is subject to corporate governance practices imposed by:

- (i) The Companies Act, which is available for inspection at the registered office of the Company and may also be obtained at: <http://www.irishstatutebook.ie>;
- (ii) The Articles of Association of the Company, which are available for inspection at the registered office of the Company at Goodbody Secretarial Limited, 3 Dublin Landings, North Wall Quay, IFSC Dublin 1 and at the Companies Registration Office in Ireland;
- (iii) The Central Bank in their UCITS Regulations, which can be obtained from the Central Bank's website at: <https://www.centralbank.ie/regulation/industry-market-sectors/funds/ucits/legislation> and are available for inspection at the registered office of the Company; and
- (iv) Euronext Dublin, through the Euronext Dublin Code of Listing Requirements and Procedures for Investment Funds, which can be obtained at: <http://www.ise.ie>.

A corporate governance code applicable to Irish domiciled collective investment schemes was issued by the Irish Funds Industry Association on 14 December 2011 (the "Code"). The Board voluntarily adopted the Code on 11 December 2012 with effect from 1 January 2013.

***Internal Control and Risk Management Systems in Relation to Financial Reporting***

The Board is responsible for establishing and maintaining adequate internal control and risk management systems of the Company in relation to the financial reporting process. Such systems are designed to manage, rather than eliminate, the risk of error or fraud in achieving the Company's financial reporting objectives and can only provide reasonable and not absolute assurance against material misstatement or loss.

The Board has procedures in place to ensure that all relevant books of account are properly maintained and are readily available, including production of annual and half yearly financial statements. The Board has appointed the Administrator to maintain the books and records of the Company. The Administrator is authorised and regulated by the Central Bank and must comply with the rules imposed by the Central Bank. From time to time, the Board of Directors examines and evaluates the Administrator's financial accounting and reporting routines. The annual and half yearly financial statements of the Company are produced by the Administrator, reviewed by the Investment Manager, the Designated Persons, and approved by the Board. The annual financial statements of the Company are required to be filed with the Central Bank, Euronext Dublin and the Companies Registration Office. The half yearly financial statements are required to be filed with the Central Bank.

**DIRECTORS' REPORT (continued)**

**Corporate Governance Statement (continued)**

***Internal Control and Risk Management Systems in Relation to Financial Reporting (continued)***

The Board is responsible for the review and approval of the annual financial statements as set out in the Statement of Directors' Responsibilities. The statutory financial statements are required to be audited by independent auditors who report annually to the Board on their findings. The Board monitors and evaluates the independent auditor's qualifications and independence. As part of its review procedures, the Board receives presentations from relevant parties including considerations of Irish accounting standards and their impact on the annual financial statements, and presentations and reports on the audit process. The Board evaluates and discusses significant accounting and reporting issues as the need arises.

***Dealings with Shareholders***

The convening and conduct of Shareholders' meetings are governed by the Articles of Association of the Company and the Companies Act. Although the Directors may convene an extraordinary general meeting of the Company at any time, the Directors are required to convene an annual general meeting of the Company within fifteen months of the date of the previous annual general meeting, provided that an annual general meeting is held once in each year within six months of the end of each accounting period of the Company.

At least twenty-one clear days' notice of every annual general meeting and any meeting convened for the passing of a special resolution must be given to Shareholders and seven days' notice must be given in the case of any other general meeting, unless the auditors of the Company and all the Shareholders of the Company entitled to attend and vote agree to a shorter notice period. Two Shareholders present either in person or by proxy constitutes a quorum at a general meeting. The share capital of the Company is divided into different Classes of Shares and the Companies Act and the Articles of Association provide that the quorum for a general meeting convened to consider any alteration to the rights attached to any Class of Shares, is two or more Shareholders present in person or by proxy, holding or representing by proxy at least one third of the issued Shares of the relevant Class.

Every holder of participating Shares or non-participating Shares present, in person or by proxy, who votes on a show of hands is entitled to one vote. On a poll, every holder of participating Shares present, in person or by proxy, is entitled to one vote in respect of each Share held by him. At any general meeting, a resolution put to the vote of the meeting is decided on a show of hands unless, before or upon the declaration of the result of the show of hands, a poll is demanded by the Chairman of the general meeting, or by at least three members or Shareholders present, in person or by proxy, or any holder or holders of participating Shares present, in person or by proxy, representing at least one tenth of the Shares in issue having the right to vote at such meeting.

Shareholders may resolve to sanction an ordinary resolution or special resolution at a Shareholders' meeting. Alternatively, a resolution in writing signed by all of the Shareholders and holders of non-participating Shares for the time being entitled to attend and vote on such resolution at a general meeting of the Company, will be valid and effective for all purposes as if the resolution had been passed at a general meeting of the Company duly convened and held. An ordinary resolution of the Company (or of the Shareholders of a particular fund or Class of Shares) requires a simple majority of the votes cast by the Shareholders voting, in person or by proxy, at the meeting at which the resolution is proposed. A special resolution of the Company (or of the Shareholders of a particular Fund or Class of Shares) requires a majority of not less than 75% of Shareholders present, in person or by proxy, and voting in general meeting in order to pass a special resolution including a resolution to amend the Articles of Association.

***Board Composition and Activities***

In accordance with the Companies Act and the Articles of Association, unless otherwise determined by an ordinary resolution of the Company in a general meeting, the number of Directors may not be less than three. Details of the current Directors are set out on page 1, under the heading "Directors".

The business of the Company is managed by the Directors, who exercise all such powers of the Company permitted by the Companies Act, or by the Articles of Association of the Company required to be exercised by the Company at a General Meeting.

The Board is responsible for the Company's overall direction and strategy and to this end it reserves the decision-making power on issues such as the determination of medium and long-term goals, review of managerial performance, organisational structure and capital needs and commitments to achieve the Company's strategic goals. To achieve these responsibilities, a Director may, and the Secretary on the requisition of a Director will, at any time, summon a meeting of the Directors in addition to the four regular Board Meetings which are convened as required.

## MONTANARO SMALLER COMPANIES PLC

### DIRECTORS' REPORT (continued)

#### Corporate Governance Statement (continued)

##### *Board Composition and Activities (continued)*

Questions arising at any meeting of the Directors are determined by a majority of votes. In the case of an equality of votes, the Chairman of the meeting at which the show of hands takes place, or at which the poll is demanded, shall be entitled to a second or casting vote. The quorum necessary for the transaction of business at a meeting of the Directors is two.

#### On behalf of the Board of Directors:

DocuSigned by:  
  
40B988F38CC9456...  
**Gavin Caldwell**  
**Director**  
**23 March 2023**

DocuSigned by:  
  
38359FAAAC0843D...  
**Lisa Martensson**  
**Director**



BNY MELLON

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## REPORT FROM THE DEPOSITARY TO THE SHAREHOLDERS

For the period from 1 January 2022 to 31 December 2022 (the “**Period**”)

The Bank of New York Mellon SA/NV, Dublin Branch (the “**Depository**” “**us**”, “**we**”, or “**our**”) has enquired into the conduct of Montanaro Smaller Companies Plc (the “**Company**”) for the Period in its capacity as Depository to the Company.

This report, including the opinion, has been prepared for the shareholders in the Company, in accordance with our role as Depository to the Company and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown.

### Responsibilities of the Depository

Our duties and responsibilities are outlined in Regulation 34 of the of the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (S.I. No 352 of 2011), as amended (the “**Regulations**”).

Our report shall state whether, in our opinion, the Company has been managed in that period in accordance with the provisions of the Company’s constitutional documentation and the Regulations. It is the overall responsibility of the Company to comply with these provisions. If the Company has not been so managed, we as Depository must state in what respects it has not been so managed and the steps which we have taken in respect thereof.

### Basis of Depository Opinion

The Depository conducts such reviews as it, in its reasonable opinion, considers necessary in order to comply with its duties and to ensure that, in all material respects, the Company has been managed (i) in accordance with the limitations imposed on its investment and borrowing powers by the provisions of its constitutional documentation and the appropriate regulations and (ii) otherwise in accordance with the Company’s constitutional documentation and the appropriate regulations.

### Opinion

In our opinion, the Company has been managed during the Period, in all material respects:

- (i) in accordance with the limitations imposed on the investment and borrowing powers of the Company by the constitutional documentation and the Regulations; and
- (ii) otherwise in accordance with the provisions of the constitutional documentation and the Regulations.

*Michelle Moroney*

For and on behalf of  
The Bank of New York Mellon SA/NV, Dublin Branch  
Riverside Two,  
Sir John Rogerson’s Quay,  
Grand Canal Dock,  
Dublin 2.

Date: 23 March 2023

Registered in Ireland No. 907126, VAT No. IE9578054E

The Bank of New York Mellon SA/NV, trading as The Bank of New York Mellon SA/NV, Dublin Branch is authorised by the National Bank of Belgium regulated by the Central Bank of Ireland for conduct of business rules.

The Bank of New York Mellon SA/NV, 46 Rue Montoyerstraat, B-1000 Brussels, Belgium - Tel. (32) 2 545 81 11, V.A.T. BE 0806.743.159 - RPM-RPR Brussels Company No. 0806.743.159. The Bank of New York Mellon SA/NV is a Belgian limited liability company, authorized and regulated as a significant credit institution by the European Central Bank and the National Bank of Belgium under the Single Supervisory Mechanism and by the Belgian Financial Services and Markets Authority.



# MONTANARO SMALLER COMPANIES PLC

## PERFORMANCE SUMMARY

	Montanaro European Smaller Companies Fund							
	EUR	EUR (Acc)	GBP	GBP (Inst)	USD	EUR (Inst)	EUR (Inst, Acc)	SEK (Acc)
31/12/22 NAV per share	6.681	6.415	5.981	6.295	3.388	6.874	7.319	23.967
2022 - 12 month Fund NAV return <sup>(1)</sup>	-33.4%	-33.4%	-29.6%	-29.1%	-37.5%	-32.9%	-32.7%	-28.1%
2022 - 12 month Benchmark return <sup>(2)</sup>	-24.4%	-24.4%	-20.1%	-20.1%	-29.0%	-24.4%	-24.4%	-18.2%
3 year annualised return – Fund <sup>(1)</sup>	-1.8%	-1.9%	-0.3%	0.8%	-3.4%	-1.2%	-0.2%	0.1%
3 year annualised return – Benchmark <sup>(2)</sup>	-1.7%	-1.7%	-0.2%	-0.2%	-3.4%	-1.7%	-1.7%	0.2%

	Montanaro UK Income Fund					Montanaro European Income Fund		
	EUR Seed	GBP Seed	EUR	GBP	GBP Acc	GBP	EUR	GBP Acc
31/12/22 NAV per share	1.189	1.871	0.830	1.049	1.033	2.028	1.211	1.192
2022 - 12 month Fund NAV return <sup>(1)</sup>	-28.0%	-23.9%	-28.3%	-24.3%	-24.3%	-17.9%	-22.3%	-17.9%
2022 - 12 month Benchmark return <sup>(2)</sup>	-13.6% (3)	-9.1% (3)	-13.6% (3)	-9.1% (3)	-9.1% (3)	-8.9% (4)	-13.8% (4)	-15.5% (4)
3 year annualised return - Fund <sup>(1)</sup>	-5.1%	-3.7%	-5.6%	-4.1%	-4.1%	3.0%	1.4%	3.0%
3 year annualised return – Benchmark <sup>(2)</sup>	- (3)	- (3)	- (3)	- (3)	- (3)	- (4)	- (4)	- (4)

	Montanaro European MidCap Fund		Montanaro Global Innovation Fund <sup>(5)</sup>			
	EUR	EUR (Inst, Acc)	GBP Acc 'A' <sup>(6)</sup>	EUR Acc 'A' <sup>(6)</sup>	GBP Acc 'B' <sup>(7)</sup>	EUR Acc 'B' <sup>(7)</sup>
31/12/22 NAV per share	2.377	2.543	0.767	0.748	1.659	1.572
2022 - 12 month Fund NAV return <sup>(1)</sup>	-28.4%	-27.8%	-30.7%	-34.4%	-30.7%	-34.4%
2022 - 12 month Benchmark return <sup>(2)</sup>	-21.5%	-21.5%	-8.7%	-13.6%	-8.7%	-13.6%
3 year annualised return - Fund <sup>(1)</sup>	-0.7%	-0.3%	-	-	-	-
3 year annualised return – Benchmark <sup>(2)</sup>	-3.2%	-3.2%	-	-	-	-

# MONTANARO SMALLER COMPANIES PLC

## PERFORMANCE SUMMARY (continued)

	Montanaro Better World Fund			
	GBP	EUR	SEK	EUR Acc <sup>(8)</sup>
31/12/22 NAV per share	1.415	1.392	12.488	0.915
2022 - 12 month Fund NAV return <sup>(1)</sup>	-29.5%	-33.3%	-27.7%	-33.3%
2022 - 12 month Benchmark return <sup>(2)</sup>	-8.7% <sup>(9)</sup>	-13.6% <sup>(9)</sup>	-6.6% <sup>(9)</sup>	-13.6% <sup>(9)</sup>
3 year annualised return - Fund <sup>(1)</sup>	4.5%	2.9%	5.2%	-
3 year annualised return – Benchmark <sup>(2)</sup>	- <sup>(9)</sup>	- <sup>(9)</sup>	- <sup>(9)</sup>	- <sup>(9)</sup>

- <sup>(1)</sup> Source: Montanaro. NAV to NAV, unrounded. Montanaro UK Income Fund, Montanaro European Income Fund, Montanaro Global Innovation Fund and Montanaro Better World Fund dividends reinvested at EX date.
- <sup>(2)</sup> The relevant benchmark information for the Sub-Funds and Share Classes can be found on pages 16 to 21. Source for benchmark returns: Bloomberg, MSCI.
- <sup>(3)</sup> Please note that as of 01/07/16 the Montanaro UK Income Fund's benchmark was removed. Effective April 2020 the Benchmark became the IA UK All Companies Sector (Total Return).
- <sup>(4)</sup> Please note that as of 29/06/18 the Montanaro European Income Fund's benchmark was removed. Effective April 2020 the Benchmark became the IA Europe (excluding UK) Sector (Total Return).
- <sup>(5)</sup> There was a change of strategy, benchmark and name change for the sub-fund as reflected in the prospectus dated 29th June 2021. Performance history shown is therefore from this point. Prior to the change, the sub-fund was called the Montanaro Select Fund, which was launched on the 1st July 2016 and had the MSCI Europe SmallCap index as the benchmark.
- <sup>(6)</sup> Introduced 30/06/21.
- <sup>(7)</sup> Converted 29/06/21.
- <sup>(8)</sup> Introduced 30/11/20.
- <sup>(9)</sup> The MSCI World SMID Cap Index (Total Return) became the official Benchmark for the Montanaro Better World Fund with effect from April 2020. Prior to this the Fund did not have a benchmark.

**PERFORMANCE SUMMARY (continued)**

**Review**

As the global pandemic of Covid-19 eased, some commentators suggested an economic boom was on the cards. Freed from lockdown, the world was ready to party: “Goodbye virus...hello Roaring Twenties<sup>(1)</sup>” screamed one hopeful article in the Financial Times. You only had to look back a century to the boom that followed the 1918 pandemic (Spanish Flu) to see what would follow: a hedonistic decade of economic growth and stock market excess spurred by technological innovation (the car and the radio); “the illicit thrill of Prohibition moonshine and the un-girdling of women”<sup>1</sup>. London had its “Bright Young Things”, New York the Jazz Age of The Great Gatsby.

While economic growth initially rebounded faster from the impact of Covid than many had expected, 2022 brought surprises that derailed this trajectory. The first war in Europe since the Second World War brought with it rising oil prices and inflation unseen in a generation. The era of easy money came to an abrupt halt. The mood music changed. It was as brutal a start to a year as we can remember.

Our Funds recorded one of the worst months ever in relative terms in January 2022. The reason for this was a dramatic style rotation from Growth to Value, one of the fastest that we have witnessed in over 30 years of managing Small and MidCap portfolios. The swift change in sentiment was due to a burst of global inflation, which stoked fears of interest rate rises and disproportionately hurt long duration assets, notably Growth Small and MidCap equities.

The year did not get much better for Quality Growth managers as recessionary fears mounted. Exacerbated by the dreadful war in Ukraine, investors sought refuge in larger companies. The result was our worst year looking after investments for our clients since 2008 on an absolute basis and our worst relative year since the Eurozone crisis of 2013. Usually, our Portfolios hold up well in market downturns due their high quality. Not so this time. The rotation out of SmallCap, Quality and Growth was a “perfect storm”.

It is never nice to report such disappointing results and for this we are sorry. Yet as we note below, the outlook offers us hope for the months ahead.

**Performance of Funds (all figures quoted in Euros)**

The NAV of the Euro Class of the **Montanaro European Smaller Companies Fund** fell by 33.4% in 2022, an underperformance of 9% relative to the MSCI Europe Small Cap benchmark index. The Fund suffered from the severe headwinds experienced by the Quality and Growth styles, against a backdrop of rising interest rates.

The strongest contributors were 4imprint, the supplier of promotional merchandise in the US and the UK; MTU Aero Engines, the German maker of commercial aircraft engines; and Ideagen, a UK supplier of compliance software which was taken over by HG Capital at a premium of 46%.

The largest detractors were MIPS, the Swedish manufacturer of safety inserts for helmets; Thule, the world leader in roof boxes for cars; and Marshalls, the UK’s leading hard landscaping manufacturer.

The Euro Seed Class of the **Montanaro UK Income Fund** saw its NAV decline by 28% in 2022 (including dividends reinvested), 14.4% behind the IA UK All Companies Sector benchmark. The underperformance resulted from two main factors: the significant underperformance of SmallCap compared to LargeCap (which is relevant given the benchmark’s bias to LargeCap), and an intense style rotation in favour of Low Quality and Value.

The largest contributors were 4imprint, the supplier of promotional merchandise in the US and the UK; Brewin Dolphin, the UK wealth manager which was taken over by Royal Bank of Canada; and Bloomsbury, the British publisher of Harry Potter.

The largest detractors were Marshalls, the UK’s leading hard landscaping manufacturer; XP Power, the UK provider of power solutions; and Vistry, the housebuilder.

The Fund’s overall distributions were flat in 2022, but this does not tell the full story. Indeed, distributions from ordinary dividends grew 20%, surpassing the pre-Covid 2019 peak to reach an all-time high. However, these were offset – as expected – by markedly lower distributions from special dividends compared to 2021 (partly due to the exceptionally large special dividend received from Pennon in that year).

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<sup>1</sup> “The need for a damned good party”, *Financial Times*, 1 January 2021

## MONTANARO SMALLER COMPANIES PLC

### PERFORMANCE SUMMARY (continued)

#### Performance of Funds (all figures quoted in Euros) (continued)

The NAV of the Euro Class of the **Montanaro European Income Fund** decreased by 22.3% over the year (including dividends reinvested), 8.5% behind the IA Europe (excluding UK) Sector benchmark. Similar to the Montanaro UK Income Fund, the Fund suffered from style headwinds combined with significant underperformance of Small and MidCap, with the benchmark showing a strong bias towards LargeCap.

The largest contributors were Edenred, the French company behind the invention of the 'Ticket Restaurant'; Galenica, the Swiss pharmacy chain; and Burckhardt Compression, a leading gas compressor manufacturer.

The largest detractors were Thule, the world leader in roof boxes for cars; Nolato, the Swedish contract manufacturing of silicon and plastic moulded devices and components; and Avanza, the leading fund platform in Sweden.

Pleasingly, Fund distributions increased by 27% during the year, as the post-COVID recovery in dividends gained momentum.

The NAV of the Euro Class of the **Montanaro European MidCap Fund** declined by 28.4% during the year, an underperformance of 6.9% relative to the Stoxx Europe Mid 200 benchmark index. Like the other sub-funds, the MidCap Fund suffered from the severe underperformance of the Quality and Growth styles against a backdrop of rising interest rates.

The strongest contributors were Edenred, the French company behind the invention of the 'Ticket Restaurant'; MTU Aero Engines, the German maker of commercial aircraft engines; and Galenica, the Swiss pharmacy chain.

The largest detractors were Dechra Pharmaceuticals, the UK animal health specialist; Teleperformance, the leading global call centre and business process outsourcing provider which was accused of poor labour practices in Colombia; and Temenos, the Swiss provider of banking software.

The NAV of the 'A' Euro Share Class\* of the **Montanaro Global Innovation Fund** fell by 34.4% during the year (including dividends reinvested), compared to a decline of 8.7% for the MSCI World SMID Cap index (TR). The Fund, which is approximately 45% invested in Technology, suffered from the significant underperformance of Technology stocks globally.

The strongest contributors were TransMedics, the US leader in organ transplant equipment & services; Solaredge, the Israeli provider of inverters and optimizers for domestic solar panels; and Ideagen, the UK compliance software provider that was acquired last year.

The main detractors were Unity Software, the video game development engine and adtech provider; SiTime, the leader in silicon-based timing devices; and Oxford Nanopore, a leading player in long-read genetic sequencing.

The NAV of the Euro Class of the **Montanaro Better World Fund** declined by 33.3% during the year (including dividends reinvested), while the benchmark, the MSCI World SMID Cap Index, fell by 13.6% (TR). The result was primarily from the severe rotation out of Global Growth and Quality rather than from stock selection.

The strongest contributors were Solaredge, the Israeli provider of inverters and optimizers for domestic solar panels; Terna Energy, the Greek operator of windfarms and small hydroelectric plants; and Idex, a US engineering specialist of industrial and technology solutions of fluidics systems.

The main detractors were Trex, a US maker of composite decking; Zscaler, a rapidly growing cybersecurity business in the US; and MIPS, the Swedish manufacturer of safety inserts for helmets.

#### Outlook

How to think about the months ahead from an investment perspective? Perhaps like the Aymara Tribe in South America, we should walk backwards into the future. In their culture, the most important feature of time is what we know: *"we can see the present and the past; they are laid out before us...anything we know or believe about the future is based on inference from what we have experienced in the present or the past...when making plans for the future, we should take much the same attitude as if we were walking backwards into unknown terrain"*<sup>2</sup>. As an investment house founded by an anthropologist, we find such a philosophy appealing.

## **MONTANARO SMALLER COMPANIES PLC**

### **PERFORMANCE SUMMARY (continued)**

#### **Outlook (continued)**

With this in mind, what do we know and how can this inform our thinking? Many P/E valuations halved in 2022 and are back to 2016 levels or even 2008. Equity values are more attractive in our Quality Growth segment of the market than it has been for years. We also know that inflation dramatically rose last year but appears to have peaked last June. This suggests that monetary policy may be having the desired effect. If this trend continues, central bankers may refrain from further tightening.

We also know that economic growth has slowed, with some regions possibly entering into recession. In such an environment, it is likely that the earnings of equity markets will decline this year. And here comes the nub of our outlook: in such an environment, the well capitalised quality companies in which we invest should deliver *better* earnings growth than the wider market. As we walk (backwards) into the future, we can have confidence in the resilience of our companies and that, after a very difficult year, they are well placed to deliver attractive returns to our investors over the long term as they have in the past.

**Montanaro Asset Management Limited**  
**March 2023**

<sup>2</sup> *What We Owe The Future*, William Macaskill

## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER'S REVIEW**

#### **MONTANARO EUROPEAN SMALLER COMPANIES FUND (the “Fund”)**

##### **Investment Objective**

The investment objective of the Fund is to outperform its benchmark, the MSCI Europe SmallCap (Capital Return) Index.

The MSCI Europe SmallCap (Capital Return) Index is calculated daily by Morgan Stanley Capital International. The index represents the small cap segment in 15 developed countries in Europe: Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, the Netherlands, Norway, Portugal, Spain, Sweden, Switzerland and the United Kingdom.

##### **Investment Policy**

The Fund shall invest primarily in SmallCap companies quoted in the European Union, the United Kingdom, Iceland, Norway and Switzerland whose market capitalisation shall not exceed that of the largest market capitalisation of any of the constituents of the Benchmark at the time of initial investment. No unquoted investments are permitted.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023

## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER'S REVIEW (continued)**

#### **MONTANARO UK INCOME FUND (the "Fund")**

##### **Investment Objective**

The investment objective of the Fund is to deliver capital growth and income. The reference benchmark is the IA UK All Companies Sector.

##### **Investment Policy**

The Fund shall invest primarily in SmallCap and MidCap companies quoted in the United Kingdom offering an attractive dividend yield or the potential for dividend growth. Up to 20% of net assets may be invested in companies quoted in the European Union, Iceland, Norway and Switzerland. No unquoted investments are permitted.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023

## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER’S REVIEW (continued)**

#### **MONTANARO EUROPEAN INCOME FUND (the “Fund”)**

##### **Investment Objective**

The investment objective of the Fund is to deliver capital growth and income. The reference benchmark is the MSCI Europe Small Cap index.

##### **Investment Policy**

The Fund shall invest primarily in SmallCap and MidCap companies quoted in the European Union, Iceland, Norway and Switzerland offering an attractive dividend yield or the potential for dividend growth. No unquoted investments are permitted.

The Fund will invest at least 75% of its net assets in securities eligible for the Plan d’Epargne en Actions (“PEA” in France). A PEA is a savings plan which is invested in Shares issued by EEA corporation tax paying entities.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023



## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER'S REVIEW (continued)**

#### **MONTANARO EUROPEAN MIDCAP FUND (the "Fund")**

##### **Investment Objective**

The investment objective of the Fund is to outperform its benchmark, the STOXX Europe Mid 200 (Capital Return) Index.

The STOXX Europe Mid 200 (Capital Return) Index represents the mid cap segment in 18 developed countries in Europe: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Luxembourg, the Netherlands, Norway, Portugal, Spain, Sweden, Switzerland and the United Kingdom.

##### **Investment Policy**

The Fund shall invest primarily in MidCap companies quoted in the European Union, the United Kingdom, Iceland, Norway and Switzerland whose market capitalisation shall not exceed that of the largest unadjusted market capitalisation of any of the constituents of the Benchmark at the time of initial investment. No unquoted investments are permitted.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023

## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER'S REVIEW (continued)**

#### **MONTANARO GLOBAL INNOVATION FUND (the "Fund")**

##### **Investment Objective**

The investment objective of the Fund is to outperform its benchmark, the MSCI World SMID Cap (Total Return) Index.

The MSCI World SMID Cap (Total Return) Index is calculated daily by Morgan Stanley Capital International. The index represents the small and midcap segments in 23 developed countries: Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Hong Kong, Ireland, Israel, Italy, Japan, Netherlands, New Zealand, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and the United States of America.

##### **Investment Policy**

The Fund shall invest primarily in small and midcap companies quoted in global markets:

- i) whose market capitalisation does not exceed that of the largest unadjusted market capitalisation of any of the constituents of the Benchmark at the time of initial investment; and
- ii) that are leaders in technological innovation; benefit from new technologies and innovation; develop products, processes or services that will provide or benefit from technological advances and improvements throughout the world. Such companies will be active mainly, but not exclusively, in the following areas: robotics / automation, cloud computing, cyber-security, connectivity, digital transactions and healthcare technology.

In order to achieve this, the Investment Manager will rely on a research-intensive investment process designed to evaluate potential investments based on the use of proprietary databases, financial models, research conducted in-house and direct engagement with companies.

To a limited extent, the Fund may be invested in equity securities of companies which do not meet (i) and/or (ii) above. No unquoted investments are permitted.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023

## **MONTANARO SMALLER COMPANIES PLC**

### **INVESTMENT MANAGER'S REVIEW (continued)**

#### **MONTANARO BETTER WORLD FUND (the "Fund")**

##### **Investment Objective**

The investment objective of the Fund is to deliver long-term capital growth.

##### **Investment Policy**

The Fund shall invest in small and midcap companies primarily quoted in global markets and whose market capitalisation does not exceed that of the largest constituent of the Benchmark, MSCI world SMID Cap (Total Return) Index at the time of initial investment.

The MSCI World SMID Cap (Total Return) Index is calculated daily by Morgan Stanley Capital International. The index represents the small and midcap segments in 23 developed countries: Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Hong Kong, Ireland, Israel, Italy, Japan, Netherlands, New Zealand, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and the United States of America. The index rebalances semi-annually.

The securities in which the Fund invests will be listed or traded on Recognised Markets.

The Fund will seek to invest in high quality companies whose products, services or behaviour are deemed to make a positive impact on society and which emphasise sound environmental, social and governance (ESG) practices. In particular, the Investment Manager will seek to identify profitable and well managed businesses operating in markets that offer attractive structural growth opportunities, i.e. through the investment process outlined below the Investment Manager will seek to identify market sectors it expects to grow faster than GDP of the relevant country or region for a prolonged period of time. In order to achieve this, the Investment Manager will rely on a research-intensive investment process designed to evaluate potential investments based on the use of proprietary databases, financial models and direct engagement with companies.

Through their research and direct engagement with companies, the Investment Manager will seek to identify companies with management they consider to be entrepreneurial, competent, honest and trustworthy.

The Fund may not invest in companies with material revenue exposure to the manufacturing or supply of weapons, tobacco, gambling, pornography, alcohol or any other areas deemed not to meet the Investment Manager's ethical standards.

##### **Performance Review**

See Performance Summary on pages 11 to 15.

Montanaro Asset Management Limited  
March 2023

## INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF MONTANARO SMALLER COMPANIES PLC

### REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS

#### Opinion on the financial statements of Montanaro Smaller Companies Plc (the 'company')

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In our opinion the financial statements:

- give a true and fair view of the assets, liabilities and financial position of the company as at 31 December 2022 and of the loss for the financial year then ended; and
- have been properly prepared in accordance with the relevant financial reporting framework and, in particular, with the requirements of the Companies Act 2014.

The financial statements we have audited comprise:

- the Statement of Financial Position;
- the Statement of Comprehensive Income;
- the Statement of Changes in Net Assets Attributable to Holders of Redeemable Participating Shares; and
- the related notes 1 to 20, including a summary of significant accounting policies as set out in note 1.

The relevant financial reporting framework that has been applied in their preparation is the Companies Act 2014 and FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" issued by the Financial Reporting Council ("the relevant financial reporting framework").

The applicable regulations that have been applied in their preparation is the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 and Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations, 2019 ("the Applicable Regulations").

#### Basis for opinion

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We conducted our audit in accordance with International Standards on Auditing (Ireland) (ISAs (Ireland)) and applicable law. Our responsibilities under those standards are described below in the "*Auditor's responsibilities for the audit of the financial statements*" section of our report.

We are independent of the company in accordance with the ethical requirements that are relevant to our audit of the financial statements in Ireland, including the Ethical Standard issued by the Irish Auditing and Accounting Supervisory Authority (IAASA), as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## Summary of our audit approach

Key audit matters	The key audit matters that we identified in the current year were: <ul style="list-style-type: none"><li>• Valuation of financial assets at fair value through profit and loss</li><li>• Existence of financial assets at fair value through profit and loss</li></ul>
Materiality	The materiality that we used in the current year was 1% of Average Net Assets determined in respect of each Sub-Fund.
Scoping	Our audit is a risk-based approach taking into account the structure of the company, types of investments, the involvement of the third-party service providers, the accounting processes and controls in place and the industry in which the company operates.
Significant changes in our approach	There are no significant changes to our approach which we feel require disclosure.

## Conclusions relating to going concern

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

Our evaluation of the directors' assessment of the company's ability to continue to adopt the going concern basis of accounting included:

- As part of our risk assessment procedures, we obtained an understanding of the relevant controls in place regarding going concern as part of our audit risk assessment procedures.
- Held discussions with management on the directors' going concern assessment, the future plans for the company and the feasibility of those plans.
- Challenged the reasonableness of the key assumptions applied by the directors in their assessment.
- Reviewed all board meeting minutes during the period up to the date of approval of the financial statements, for evidence of any discussions and/or decisions that could impact the company's ability to continue as a going concern.
- Reviewed the capital activity and NAV movements, subsequent to the financial year end.
- Assessed the adequacy of the relevant going concern disclosures made in the annual accounts.

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

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

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current financial year and include the most significant assessed risks of material misstatement (whether or not due to fraud) we identified, including those which had the greatest effect on: the overall audit strategy, the allocation of resources in the audit; and directing the efforts of the engagement team. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

### Valuation of financial assets at fair value through profit and loss

#### Key audit matter description



For the financial year ended, the financial assets and liabilities at fair value through profit or loss of the company is €2.085 billion representing 98.1% of total net assets €2.125 billion. The valuation of financial assets and liabilities at fair value through profit or loss is considered a key audit matter as financial assets and liabilities at fair value through profit or loss represents a significant balance on the Statement of Financial Position.

There is a risk that financial assets and liabilities at fair value through profit or loss are valued incorrectly, inappropriate valuation methodologies are applied, and the use of inappropriate assumptions could result in the valuation being materially misstated.

Refer also to note 1 and note 8 in the financial statements.

#### How the scope of our audit responded to the key audit matter



We have performed the following procedures to address the key audit matter:

- We obtained the BNY Mellon Fund Services (Ireland) Designated Activity Company SOC 1 Report in order to gain an understanding and evaluate the design, implementation, and operating effectiveness of key controls over the valuation process for financial assets and liabilities at fair value through profit or loss; and
- We independently valued the financial assets by using independent market feeds. We compared the prices published by independent pricing sources to the investment portfolio.

### Existence of financial assets at fair value through profit and loss

#### Key audit matter description



For the financial year ended, the financial assets and liabilities at fair value through profit or loss of the company is €2.085 billion representing 98.1% of total net assets €2.125 billion. The existence of financial assets and liabilities at fair value through profit or loss is considered a key audit matter as financial assets and liabilities at fair value through profit or loss represents a significant balance on the Statement of Financial Position.

The existence of financial assets and liabilities at fair value through profit or loss is crucial to ensuring the financial statements are free from material misstatement.

Refer also to note 1 and note 8 in the financial statements.

#### How the scope of our audit responded to the key audit matter



We have performed the following procedures to address the key audit matter:

- We obtained the BNY Mellon Fund Services (Ireland) Designated Activity Company SOC 1 Report in order to gain an understanding and evaluate the design, implementation, and operating effectiveness of key controls over the valuation process for financial assets and liabilities at fair value through profit or loss; and
- We obtained independent confirmations from the depositary and counterparties at the financial year end and agreed the amounts held to the investment portfolio.

Our audit procedures relating to these matters were designed in the context of our audit of the financial statements as a whole, and not to express an opinion on individual accounts or disclosures. Our opinion on the financial statements is not modified with respect to any of the risks described above, and we do not express an opinion on these individual matters.

## Our application of materiality

We define materiality as the magnitude of misstatement in the financial statements that makes it probable that the economic decisions of a reasonably knowledgeable person would be changed or influenced. We use materiality both in planning the scope of our audit work and in evaluating the results of our work.

Based on our professional judgement, we determined materiality for the financial statements as a whole as follows:

<b>Basis for determining materiality</b>	1% of Average Net Assets of each Sub-Fund
<b>Rationale for the benchmark applied</b>	The Net Asset Value of the company is the primary indicator of the size and performance of the company and is considered the key area of interest for the shareholders, who are the primary users of the annual accounts. The use of the Average Net Asset Value is considered the industry practice benchmark for Investment Funds.

We set performance materiality at a level lower than materiality to reduce the probability that, in aggregate, uncorrected and undetected misstatements exceed the materiality for the annual accounts as a whole. Performance materiality was set at 50% of materiality for the 2022 audit. In determining performance materiality, we considered the following factors:

- our understanding of the company;
- the quality of the control environment;
- the nature and extent of misstatements identified in previous audits; and
- our expectations in relation to misstatements in the current period.

We agreed with the Board of Directors that we would report to them all audit differences in excess of 5% of materiality, as well as differences below that threshold that, in our view, warranted reporting on qualitative grounds. We also report to the Board of Directors on disclosure matters that we identified when assessing the overall presentation of the financial statements.

## An overview of the scope of our audit

Our audit is a risk-based approach taking into account the structure of the company, types of investments, the involvement of the third parties service providers, the accounting processes and controls in place and the industry in which the company operates. The company is incorporated as an open-ended umbrella company with variable capital and is organised under the laws of Ireland as a public limited company pursuant to the Companies Act 2014. The company is authorised by the Central Bank of Ireland (“the Central Bank”) as a UCITS (Undertakings for Collective Investment in Transferable Securities) pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011. The company is organised as an umbrella fund with segregated liability between each Sub-Fund. We assess the risks of each Sub-Fund separately. We have conducted our audit based on the books and records maintained by the administrator BNY Mellon Fund Services (Ireland) Designated Activity Company at One Dockland Central, Guild Street, Dublin 1.

## Other information

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The other information comprises the information included in the Annual Report and Audited Financial Statements, other than the financial statements and our auditor's report thereon. The directors are responsible for the other information contained within the Annual Report and Audited Financial Statements.

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

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

We have nothing to report in this regard.

## Responsibilities of directors

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As explained more fully in the Statement of Directors' Responsibilities, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view and otherwise comply with the Companies Act 2014, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the company or to cease operations, or have no realistic alternative but to do so.

## Auditor's responsibilities for the audit of the financial statements

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

A further description of our responsibilities for the audit of the financial statements is located on IAASA's website at: <https://iaasa.ie/publications/description-of-the-auditors-responsibilities-for-the-audit-of-the-financial-statements/>. This description forms part of our auditor's report.



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

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

### Identifying and assessing potential risks related to irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, we considered the following:

- the nature of the industry and sector, control environment and business performance;
- results of our enquiries of management about their own identification and assessment of the risks of irregularities;
- any matters we identified having obtained and reviewed the company's documentation of their policies and procedures relating to:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud;
  - the internal controls established to mitigate risks of fraud or non-compliance with laws and regulations;
- the matters discussed among the audit engagement team and relevant internal specialists, including IT and valuations regarding how and where fraud might occur in the annual accounts and any potential indicators of fraud.

As a result of these procedures, we considered the opportunities and incentives that may exist within the organisation for fraud and identified the greatest potential for fraud in the following areas: Valuation of financial assets at fair value through profit and loss and Revenue Recognition. In common with all audits under ISAs (Ireland), we are also required to perform specific procedures to respond to the risk of management override.

We also obtained an understanding of the legal and regulatory framework that the company operates in, focusing on provisions of those laws and regulations that had a direct effect on the determination of material amounts and disclosures in the annual accounts. The key laws and regulations we considered in this context included the Companies Act, Listing Rules and the Applicable Regulations.

In addition, we considered provisions of other laws and regulations that do not have a direct effect on the annual accounts but compliance with which may be fundamental to the company's ability to operate or to avoid a material penalty. These included matters regulated by the Central Bank of Ireland.

## Audit response to risks identified

As a result of performing the above, we identified 'Valuation of Investments' as a key audit matter related to the potential risk of fraud. The key audit matters section of our report explains the matter in more detail and also describes the specific procedures we performed in response to that key audit matter.

In addition to the above, our procedures to respond to risks identified included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the annual accounts;
- enquiring of management and the Board of Directors concerning actual and potential litigation and claims;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- reading minutes of meetings of those charged with governance and reviewing correspondence with the Central Bank of Ireland;
- In addressing the risk of fraud in Revenue Recognition, independently valuing all securities using our own market feeds and completing an unrealised gain/loss reconciliation; and
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

We also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

## Report on other legal and regulatory requirements

### Opinion on other matters prescribed by the Companies Act 2014

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Based solely on the work undertaken in the course of the audit, we report that:

- We have obtained all the information and explanations which we consider necessary for the purposes of our audit.
- In our opinion the accounting records of the company were sufficient to permit the financial statements to be readily and properly audited.
- The financial statements are in agreement with the accounting records.
- In our opinion the information given in the directors' report is consistent with the financial statements and the directors' report has been prepared in accordance with the Companies Act 2014.

## Corporate Governance Statement required by the Companies Act 2014

We report, in relation to information given in the Corporate Governance Statement on pages 7 to 9 that:

- In our opinion, based on the work undertaken during the course of the audit, the information given in the Corporate Governance Statement pursuant to subsections 2(c) of section 1373 of the Companies Act 2014 is consistent with the company's statutory financial statements in respect of the financial year concerned and such information has been prepared in accordance with the Companies Act 2014. Based on our knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified any material misstatements in this information.
- In our opinion, based on the work undertaken during the course of the audit, the Corporate Governance Statement contains the information required by Regulation [6(2) of the European Union (Disclosure of Non-Financial and Diversity Information by certain large undertakings and groups) Regulations 2017 (as amended); and
- In our opinion, based on the work undertaken during the course of the audit, the information required pursuant to section 1373(2)(a),(b),(e) and (f) of the Companies Act 2014 is contained in the Corporate Governance Statement.

### Matters on which we are required to report by exception

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Based on the knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified material misstatements in the the directors' report.

We have nothing to report in respect of the provisions in the Companies Act 2014 which require us to report to you if, in our opinion, the disclosures of directors' remuneration and transactions specified by law are not made.

The Listing Rules of the Euronext Dublin require us to review six specified elements of disclosures in the report to shareholders by the Board of Directors' remuneration committee. We have nothing to report in this regard.

### Other matters which we are required to address

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We were appointed by Board of Directors on 20 September 2022 to audit the financial statements for the 31 December 2021. The period of total uninterrupted engagement including previous renewals and reappointments of the firm is two years, covering the years ending 31 December 2021 to 31 December 2022.

The non-audit services prohibited by IAASA's Ethical Standard were not provided and we remained independent of the company in conducting the audit.

Our audit opinion is consistent with the additional report to the audit committee we are required to provide in accordance with ISA (Ireland) 260.

## Use of our report

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This report is made solely to the company's members, as a body, in accordance with Section 391 of the Companies Act 2014. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members as a body, for our audit work, for this report, or for the opinions we have formed.



Brian Forrester  
For and on behalf of Deloitte Ireland LLP  
Chartered Accountants and Statutory Audit Firm  
Deloitte & Touche House, Earlsfort Terrace, Dublin 2

Date: 18 April 2023

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF FINANCIAL POSITION

*As at 31 December 2022*

		Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €
<b>Current assets</b>	<b>Note</b>				
Cash and cash equivalents	6	6,844,192	12,898,626	6,152,571	3,712,866
Financial assets at fair value through profit or loss	4				
- Equities		395,876,138	619,198,810	281,957,439	98,323,034
Dividends receivable		277,222	1,846,995	–	37,419
Receivable for fund Shares sold		101,557	–	–	14
Other receivables		582,896	337,298	897,137	146,092
<b>Total current assets</b>		<b>403,682,005</b>	<b>634,281,729</b>	<b>289,007,147</b>	<b>102,219,425</b>
<b>Current liabilities</b>					
Payable for fund Shares repurchased		(280,281)	–	(59,053)	(923)
Management fees payable	3	(2,121)	(3,348)	(1,504)	(540)
Investment management fees payable	3	(1,177,118)	(876,211)	(542,064)	(373,684)
Administration fees payable	3	(147,979)	(238,241)	(104,260)	(26,374)
Depositary fees payable	3	(43,805)	(36,099)	(32,326)	(9,812)
Legal fees payable		(2,289)	(3,238)	(1,972)	(730)
Professional fees payable	3	(6,140)	(9,386)	(4,563)	(1,662)
Audit fees payable	3	(10,472)	(16,066)	(7,830)	(2,833)
Other accrued expenses payable	3	(9,165)	(17,589)	(3,658)	(1,390)
<b>Total current liabilities</b>		<b>(1,679,370)</b>	<b>(1,200,178)</b>	<b>(757,230)</b>	<b>(417,948)</b>
<b>Net asset value attributable to holders of redeemable participating Shares</b>		<b>402,002,635</b>	<b>633,081,551</b>	<b>288,249,917</b>	<b>101,801,477</b>

Please refer to Note 15 for NAV and NAV per Share details.

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF FINANCIAL POSITION

*As at 31 December 2022 (continued)*

		Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
<b>Current assets</b>	<b>Note</b>			
Cash and cash equivalents	6	136,502	9,117,092	40,501,291
Financial assets at fair value through profit or loss	4			
- Equities		10,968,641	599,915,022	2,084,940,534
Dividends receivable		494	99,722	2,496,609
Receivable for fund Shares sold		—	783,428	884,999
Other receivables		3,830	280,585	2,290,709
<b>Total current assets</b>		<b>11,109,467</b>	<b>610,195,849</b>	<b>2,131,114,142</b>
<b>Current liabilities</b>				
Payable for fund Shares repurchased		—	(36,475)	(376,732)
Management fees payable	3	838	(3,268)	(10,369)
Investment management fees payable	3	(7,084)	(1,293,453)	(4,380,982)
Administration fees payable	3	(4,897)	(229,297)	(781,329)
Depositary fees payable	3	(2,417)	(60,786)	(189,833)
Legal fees payable		(69)	(6,782)	(15,491)
Professional fees payable	3	(4,382)	(11,572)	(38,898)
Audit fees payable	3	(299)	(19,950)	(59,492)
Other accrued expenses payable	3	(197)	(19,963)	(54,198)
<b>Total current liabilities</b>		<b>(18,507)</b>	<b>(1,681,546)</b>	<b>(5,907,324)</b>
<b>Net asset value attributable to holders of redeemable participating Shares</b>		<b>11,090,960</b>	<b>608,514,303</b>	<b>2,125,206,818</b>

\* See Note 1 Statement of Accounting Policies (h).

Please refer to Note 15 for NAV and NAV per Share details.

*The accompanying notes form an integral part of these financial statements.*

### On behalf of the Board of Directors:

DocuSigned by:  
  
 40B988F38CC9456...  
**Gavin Caldwell**  
 Director  
 23 March 2023

DocuSigned by:  
  
 38359FAAAC0843D...  
**Lisa Martensson**  
 Director

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF FINANCIAL POSITION

*As at 31 December 2021*

		Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €
<b>Current assets</b>	<b>Note</b>				
Cash and cash equivalents	6	25,417,507	12,378,802	6,633,676	1,221,233
Financial assets at fair value through profit or loss	4				
- Equities		608,443,167	831,668,777	408,134,139	173,857,619
Dividends receivable		400,779	2,049,016	–	–
Receivable for fund Shares sold		103,281	–	17,979	–
Receivable for investments sold		–	–	–	2,361,114
Other receivables		563,210	129,381	782,457	116,326
<b>Total current assets</b>		<b>634,927,944</b>	<b>846,225,976</b>	<b>415,568,251</b>	<b>177,556,292</b>
<b>Current liabilities</b>					
Payable for fund Shares repurchased		(304,308)	–	(3)	(1,233,987)
Payable for investments purchased		–	–	–	(933,814)
Management fees payable	3	(8,747)	(11,846)	(6,031)	(2,552)
Investment management fees payable	3	(1,784,534)	(1,083,956)	(778,655)	(611,089)
Performance fees payable**	3	(5,743,450)	–	–	(3,141,946)
Administration fees payable	3	(140,130)	(177,723)	(92,559)	(25,953)
Depositary fees payable	3	(47,814)	(31,677)	(31,136)	(10,759)
Legal fees payable		(3,137)	(5,190)	(2,718)	(955)
Professional fees payable	3	(5,007)	(6,988)	(3,656)	(1,531)
Audit fees payable	3	(11,460)	(15,994)	(8,364)	(3,504)
Other accrued expenses payable	3	(9,283)	(7,316)	(668)	(133)
<b>Total current liabilities</b>		<b>(8,057,870)</b>	<b>(1,340,690)</b>	<b>(923,790)</b>	<b>(5,966,223)</b>
<b>Net asset value attributable to holders of redeemable participating Shares</b>		<b>626,870,074</b>	<b>844,885,286</b>	<b>414,644,461</b>	<b>171,590,069</b>

\*\* Performance fees are accrued and taken into account in the calculation of the NAV on each dealing day when the performance fee conditions have been met. They crystallise at the financial year end of the Company, i.e. 31 December and daily on redemptions where applicable. Please refer to the Prospectus for further details.

Please refer to Note 15 for NAV and NAV per Share details.

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF FINANCIAL POSITION

*As at 31 December 2021 (continued)*

		Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
<b>Current assets</b>	<b>Note</b>			
Cash and cash equivalents	6	625,289	28,168,036	76,809,388
Financial assets at fair value through profit or loss	4			
- Equities		16,752,880	965,716,067	3,163,454,569
Dividends receivable		—	45,959	2,887,197
Receivable for fund Shares sold		—	330,588	451,848
Receivable for investments sold		—	—	2,361,114
Other receivables		11,628	227,436	1,855,155
<b>Total current assets</b>		<b>17,389,797</b>	<b>994,488,086</b>	<b>3,247,819,271</b>
<b>Current liabilities</b>				
Payable for fund Shares repurchased		(10,145)	(2,240)	(1,550,683)
Payable for investments purchased		—	—	(933,814)
Management fees payable	3	(245)	(13,600)	(45,284)
Investment management fees payable	3	(10,544)	(1,712,111)	(6,187,968)
Performance fees payable**	3	—	—	(8,885,396)
Administration fees payable	3	(5,444)	(169,786)	(645,547)
Depositary fees payable	3	(3,717)	(51,261)	(182,416)
Legal fees payable		(102)	(5,514)	(18,607)
Professional fees payable	3	(136)	(7,413)	(26,066)
Audit fees payable	3	(312)	(16,966)	(59,655)
Other accrued expenses payable	3	(50)	(8,032)	(26,880)
<b>Total current liabilities</b>		<b>(30,695)</b>	<b>(1,986,923)</b>	<b>(18,562,316)</b>
<b>Net asset value attributable to holders of redeemable participating Shares</b>		<b>17,359,102</b>	<b>992,501,163</b>	<b>3,229,256,955</b>

\* See Note 1 Statement of Accounting Policies (h).

\*\* Performance fees are accrued and taken into account in the calculation of the NAV on each dealing day when the performance fee conditions have been met. They crystallise at the financial year end of the Company, i.e. 31 December and daily on redemptions where applicable. Please refer to the Prospectus for further details.

Please refer to Note 15 for NAV and NAV per Share details.

*The accompanying notes form an integral part of these financial statements.*



# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF COMPREHENSIVE INCOME

*Financial year ended 31 December 2022*

		Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €
<b>Income</b>	<b>Note</b>				
Net realised gain on financial assets at fair value through profit or loss and foreign exchange	1 (g)	8,248,268	12,205,292	13,529,179	5,749,313
Net change in fair value of financial assets at fair value through profit or loss and foreign exchange	1 (g)	(214,066,525)	(276,058,043)	(114,850,656)	(54,078,671)
Dividend income		7,133,353	25,600,910	10,707,949	2,340,967
Interest income		22,587	51,321	8,203	7,124
<b>Investment income</b>		<b>(198,662,317)</b>	<b>(238,200,520)</b>	<b>(90,605,325)</b>	<b>(45,981,267)</b>
<b>Expenses</b>					
Management fee	3	(26,646)	(41,063)	(20,138)	(7,415)
Investment management fees	3	(5,309,902)	(3,814,960)	(2,517,023)	(1,767,105)
Administration fees	3	(153,351)	(318,599)	(141,593)	(35,820)
Depositary fees	3	(75,225)	(92,514)	(65,768)	(21,432)
Legal fees		(19,649)	(28,030)	(13,720)	(5,407)
Directors' fees	3	(11,213)	(17,194)	(8,439)	(3,190)
Professional fees	3	(10,941)	(14,445)	(7,030)	(2,660)
Audit fees		(10,589)	(15,057)	(7,112)	(2,496)
Other expenses	3	(110,780)	(117,440)	(54,992)	(25,613)
<b>Total operating expenses</b>		<b>(5,728,296)</b>	<b>(4,459,302)</b>	<b>(2,835,815)</b>	<b>(1,871,138)</b>
<b>Net loss from operations</b>		<b>(204,390,613)</b>	<b>(242,659,822)</b>	<b>(93,441,140)</b>	<b>(47,852,405)</b>
Withholding taxes		(447,761)	(267,875)	(478,394)	(132,681)
<b>Finance costs</b>					
Interest expense		(50,004)	(195)	(38,951)	(10,391)
Income distribution	5	–	(18,698,974)	(5,545,967)	–
<b>Loss for the financial year</b>		<b>(204,888,378)</b>	<b>(261,626,866)</b>	<b>(99,504,452)</b>	<b>(47,995,477)</b>

Gains and losses arose solely from continuing investment activities. There were no gains or losses other than those dealt with in the Statement of Comprehensive Income.

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF COMPREHENSIVE INCOME

*Financial year ended 31 December 2022 (continued)*

		Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
<b>Income</b>	<b>Note</b>			
Net realised (loss)/gain on financial assets at fair value through profit or loss and foreign exchange	1 (g)	(762,650)	14,638,200	55,716,375
Net change in fair value of financial assets at fair value through profit or loss and foreign exchange	1 (g)	(5,086,765)	(350,137,014)	(1,061,973,676)
Dividend income		29,512	5,765,524	56,001,419
Interest income		403	27,344	125,849
<b>Investment income</b>		<b>(5,819,500)</b>	<b>(329,705,946)</b>	<b>(950,130,033)</b>
<b>Expenses</b>				
Management fee	3	152	(46,375)	(148,580)
Investment management fees	3	(31,057)	(5,661,460)	(19,760,638)
Administration fees	3	(8,019)	(317,329)	(1,029,757)
Depository fees	3	(3,062)	(132,550)	(406,535)
Legal fees		(539)	(34,247)	(106,435)
Directors' fees	3	(313)	(19,796)	(63,116)
Professional fees	3	(52,825)	(27,008)	(117,405)
Audit fees		(308)	(21,328)	(59,491)
Other expenses	3	(3,820)	(170,649)	(503,584)
<b>Total operating expenses</b>		<b>(99,791)</b>	<b>(6,430,742)</b>	<b>(22,195,541)</b>
<b>Net loss from operations</b>		<b>(5,919,291)</b>	<b>(336,136,688)</b>	<b>(972,325,574)</b>
Withholding taxes		(3,334)	(842,595)	(2,218,922)
<b>Finance costs</b>				
Interest expense		(801)	(70,928)	(171,304)
Income distribution	5	–	–	(27,475,662)
<b>Loss for the financial year</b>		<b>(5,923,426)</b>	<b>(337,050,211)</b>	<b>(1,002,191,462)</b>

\* See Note 1 Statement of Accounting Policies (h).

Gains and losses arose solely from continuing investment activities. There were no gains or losses other than those dealt with in the Statement of Comprehensive Income.

*The accompanying notes form an integral part of these financial statements.*

**MONTANARO SMALLER COMPANIES PLC**

**STATEMENT OF COMPREHENSIVE INCOME**

*Financial year ended 31 December 2021*

		<b>Montanaro European Smaller Companies Fund €</b>	<b>Montanaro UK Income Fund £</b>	<b>Montanaro European Income Fund €</b>	<b>Montanaro European MidCap Fund €</b>
<b>Income</b>	<b>Note</b>				
Net realised gain on financial assets at fair value through profit or loss and foreign exchange	1 (g)	28,990,283	27,291,390	31,292,176	30,320,635
Net change in fair value of financial assets at fair value through profit or loss and foreign exchange	1 (g)	111,962,698	174,285,924	63,563,684	14,893,232
Dividend income		5,599,698	25,708,461	9,297,963	1,774,790
Interest income		–	304	763	–
<b>Investment income</b>		<b>146,552,679</b>	<b>227,286,079</b>	<b>104,154,586</b>	<b>46,988,657</b>
<b>Expenses</b>					
Management fee	3	(8,747)	(12,133)	(6,031)	(2,552)
Investment management fees	3	(6,651,691)	(4,189,073)	(3,119,352)	(2,397,883)
Performance fees**	3	(5,743,450)	–	–	(3,141,946)
Administration fees	3	(172,858)	(322,917)	(168,879)	(45,513)
Depositary fees	3	(92,626)	(104,215)	(83,966)	(29,520)
Legal fees		(22,515)	(36,779)	(18,558)	(7,569)
Directors' fees	3	(11,551)	(17,635)	(9,411)	(3,857)
Professional fees	3	(9,315)	(14,122)	(7,381)	(3,063)
Audit fees		(9,912)	(14,938)	(6,350)	(2,855)
Other expenses	3	(113,748)	(129,113)	(67,944)	(32,149)
<b>Total operating expenses</b>		<b>(12,836,413)</b>	<b>(4,840,925)</b>	<b>(3,487,872)</b>	<b>(5,666,907)</b>
<b>Net income from operations</b>		<b>133,716,266</b>	<b>222,445,154</b>	<b>100,666,714</b>	<b>41,321,750</b>
Withholding taxes		(368,964)	(465,291)	(489,742)	(104,753)
<b>Finance costs</b>					
Interest expense		(65,914)	(2,383)	(47,457)	(20,326)
Income distribution	5	–	(18,148,289)	(4,515,443)	–
<b>Profit for the financial year</b>		<b>133,281,388</b>	<b>203,829,191</b>	<b>95,614,072</b>	<b>41,196,671</b>

\*\* Performance fees are accrued and taken into account in the calculation of the NAV on each dealing day when the performance fee conditions have been met. They crystallise at the financial year end of the Company, i.e. 31 December and daily on redemptions where applicable. Please refer to the Prospectus for further details.

Gains and losses arose solely from continuing investment activities. There were no gains or losses other than those dealt with in the Statement of Comprehensive Income.

*The accompanying notes form an integral part of these financial statements.*

**MONTANARO SMALLER COMPANIES PLC**

**STATEMENT OF COMPREHENSIVE INCOME**

*Financial year ended 31 December 2021 (continued)*

		<b>Montanaro Global Innovation Fund €</b>	<b>Montanaro Better World Fund €</b>	<b>Total* €</b>
<b>Income</b>	<b>Note</b>			
Net realised gain on financial assets at fair value through profit or loss and foreign exchange	1 (g)	2,237,948	38,306,752	162,883,198
Net change in fair value of financial assets at fair value through profit or loss and foreign exchange	1 (g)	671,678	167,322,567	561,079,763
Dividend income		48,867	4,352,740	50,968,775
Interest income		–	–	1,117
<b>Investment income</b>		<b>2,958,493</b>	<b>209,982,059</b>	<b>774,932,853</b>
<b>Expenses</b>				
Management fee	3	(245)	(13,600)	(45,284)
Investment management fees	3	(19,416)	(6,092,778)	(23,152,324)
Performance fees**	3	–	–	(8,885,396)
Administration fees	3	(7,085)	(300,991)	(1,070,825)
Depositary fees	3	(5,989)	(139,919)	(473,205)
Legal fees		(562)	(43,363)	(135,335)
Directors' fees	3	(268)	(17,597)	(63,191)
Professional fees	3	(13,542)	(26,383)	(76,105)
Audit fees		(310)	(23,621)	(60,419)
Other expenses	3	(1,618)	(169,987)	(535,583)
<b>Total operating expenses</b>		<b>(49,035)</b>	<b>(6,828,239)</b>	<b>(34,497,667)</b>
<b>Net income from operations</b>		<b>2,909,458</b>	<b>203,153,820</b>	<b>740,435,186</b>
Withholding taxes		(4,643)	(619,942)	(2,129,101)
<b>Finance costs</b>				
Interest expense		(794)	(68,085)	(205,347)
Income distribution	5	–	–	(25,618,922)
<b>Profit for the financial year</b>		<b>2,904,021</b>	<b>202,465,793</b>	<b>712,481,816</b>

\* See Note 1 Statement of Accounting Policies (h).

\*\* Performance fees are accrued and taken into account in the calculation of the NAV on each dealing day when the performance fee conditions have been met. They crystallise at the financial year end of the Company, i.e. 31 December and daily on redemptions where applicable. Please refer to the Prospectus for further details.

Gains and losses arose solely from continuing investment activities. There were no gains or losses other than those dealt with in the Statement of Comprehensive Income.

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO HOLDERS OF REDEEMABLE PARTICIPATING SHARES

*Financial year ended 31 December 2022*

	Note	Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €
<b>Net assets value attributable to holders of redeemable participating Shares at the start of the financial year</b>		626,870,074	844,885,286	414,644,461	171,590,069
Loss for the financial year		(204,888,378)	(261,626,866)	(99,504,452)	(47,995,477)
Proceeds from issuance of Shares		92,942,042	179,345,466	47,941,658	9,169,272
Payments on redemption of Shares		(112,921,103)	(167,335,528)	(74,831,750)	(30,962,387)
Foreign currency translation adjustment*		–	37,813,193	–	–
<b>Net asset value attributable to holders of redeemable participating Shares at the end of the financial year</b>		<b>402,002,635</b>	<b>633,081,551</b>	<b>288,249,917</b>	<b>101,801,477</b>

\* See Note 1 Statement of Accounting Policies (h).

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO HOLDERS OF REDEEMABLE PARTICIPATING SHARES

*Financial year ended 31 December 2022 (continued)*

	Note	Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
<b>Net assets value attributable to holders of redeemable participating Shares at the start of the financial year</b>		17,359,102	992,501,163	3,229,256,955
Loss for the financial year		(5,923,426)	(337,050,211)	(1,002,191,462)
Proceeds from issuance of Shares		1,576,920	220,747,853	582,709,672
Payments on redemption of Shares		(1,921,636)	(267,684,502)	(684,568,347)
Foreign currency translation adjustment*		—	—	—
<b>Net asset value attributable to holders of redeemable participating Shares at the end of the financial year</b>		<b>11,090,960</b>	<b>608,514,303</b>	<b>2,125,206,818</b>

\* See Note 1 Statement of Accounting Policies (h).

*The accompanying notes form an integral part of these financial statements.*

# MONTANARO SMALLER COMPANIES PLC

## STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO HOLDERS OF REDEEMABLE PARTICIPATING SHARES

*Financial year ended 31 December 2021*

	Note	Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €
<b>Net assets value attributable to holders of redeemable participating Shares at the start of the financial year</b>		425,553,879	736,604,254	411,647,401	168,080,801
Profit for the financial year		133,281,388	203,829,191	95,614,072	41,196,671
Proceeds from issuance of Shares		169,047,808	219,456,463	78,712,848	4,269,144
Payments on redemption of Shares		(101,013,001)	(265,604,264)	(171,329,860)	(41,956,547)
Foreign currency translation adjustment*		–	(49,400,358)	–	–
<b>Net asset value attributable to holders of redeemable participating Shares at the end of the financial year</b>		<b>626,870,074</b>	<b>844,885,286</b>	<b>414,644,461</b>	<b>171,590,069</b>

\* See Note 1 Statement of Accounting Policies (h).

*The accompanying notes form an integral part of these financial statements.*

**MONTANARO SMALLER COMPANIES PLC**

**STATEMENT OF CHANGES IN NET ASSETS ATTRIBUTABLE TO HOLDERS OF REDEEMABLE PARTICIPATING SHARES**

*Financial year ended 31 December 2021 (continued)*

	Note	Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
<b>Net assets value attributable to holders of redeemable participating Shares at the start of the financial year</b>		7,995,660	669,973,223	2,506,185,492
Profit for the financial year		2,904,021	202,465,793	712,481,816
Proceeds from issuance of Shares		9,773,530	364,188,286	881,183,438
Payments on redemption of Shares		(3,314,109)	(244,126,139)	(870,593,791)
Foreign currency translation adjustment*		—	—	—
<b>Net asset value attributable to holders of redeemable participating Shares at the end of the financial year</b>		<b>17,359,102</b>	<b>992,501,163</b>	<b>3,229,256,955</b>

\* See Note 1 Statement of Accounting Policies (h).

*The accompanying notes form an integral part of these financial statements.*



NOTES TO THE FINANCIAL STATEMENTS

**1. Statement of Accounting Policies**

The following accounting policies have been applied consistently in dealing with items which are considered material in relation to the Company's financial statements.

**(a) Basis of Preparation**

The financial statements for the financial year ended 31 December 2022 have been prepared on a going concern basis in accordance with the provisions of the Companies Act, the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011, (as amended), the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2019 (the "Central Bank UCITS Regulations"), the Financial Reporting Standard ("FRS") 102 the financial reporting standard applicable in the United Kingdom and Republic of Ireland issued by the Financial Reporting Council ("FRC") and the listing rules of the Euronext Dublin. The financial statements have been prepared on a historical cost basis, except for financial instruments classified at fair value through profit or loss that have been measured at fair value.

The format and certain wordings of the financial statements have been adapted from those contained in the Companies Act, so that, in the opinion of the Directors, they more appropriately reflect the Company's business as an investment fund.

The Company has availed itself of the exemption available to open-ended investment funds under Section 7 "Statement of Cash Flows" of FRS 102, not to prepare a cash flow statement on the basis that substantially all of the Company's investments are highly liquid and carried at fair value and the Company provides a Statement of Changes in Net Assets Attributable to Holders of Redeemable Participating Shares.

**(b) Income**

Income received and receivable from investments and deposits is credited to the Statement of Comprehensive Income on an accruals basis. Dividend income is credited to the Statement of Comprehensive Income on an ex-dividend basis. Income is shown gross of any non-recoverable withholding taxes, which is disclosed separately in the Statement of Comprehensive Income, and net of any tax credits.

**(c) Fees and Charges**

The investment manager's fee, manager's fee, depositary's fee, administrator's fee, Directors' fees and other operating expenses are charged to the Statement of Comprehensive Income on an accruals basis.

**(d) Subscriber Shares**

The authorised share capital of the Company is €38,100 divided into 38,100 Subscriber Shares of €1 each and 1,000,000,000 participating Shares of no par value initially designated as unclassified Shares.

The Subscriber Shares do not participate in the profits of the Company.

**(e) Redeemable Participating Shares**

All redeemable participating Shares issued by the Company provide the investors with the right to require redemption for cash at the value proportionate to the investor's share in the Company's net assets at the redemption date. Such instruments give rise to a financial liability for the present value of the redemption amount. In accordance with the Prospectus, the Company is contractually obliged to redeem Shares at the NAV per Share on the valuation date. Redeemable participating Shares are measured and presented at traded market price.

Receivable and payable amounts for Fund Shares sold and purchased are disclosed in the Statement of Financial Position.

**(f) Distributions to Holders of Redeemable Participating Shares**

Distributions to holders of redeemable participating Shares are recorded in the Statement of Comprehensive Income as a finance cost when the Fund incurs a legal or constructive obligation to pay such a dividend.

NOTES TO THE FINANCIAL STATEMENTS (continued)

1. Statement of Accounting Policies (continued)

**(g) Financial Instruments**

**(i) Classification**

The Company classifies its investments as financial assets at fair value through profit or loss. The category of financial assets and liabilities through profit or loss comprises financial instruments held for trading and those designated by the Investment Manager, at inception, as being at fair value through profit or loss. The financial assets at fair value held by the Company are equity securities and are classified as held for trading.

Under FRS 102, in accounting for all of its financial instruments, an entity is required to apply either of the following:

- (a) the full requirements of Section 11 “Basic Financial Instruments” and Section 12 “Other Financial Instruments Issues” of FRS 102; or
- (b) the recognition and measurement provisions of International Accounting Standards (“IAS”) 39 “Financial Instruments: Recognition and Measurement”, (as amended) (“IAS 39”) as adopted for use in the European Union and the disclosure requirements of Sections 11 and 12 of FRS 102; or
- (c) the recognition and measurement provisions of International Financial Reporting Standards (“IFRS”) 9 “Financial Instruments” (“IFRS 9”) and the disclosure requirements of Sections 11 and 12 of FRS 102.

The Company has elected to apply the recognition and measurement provisions of IAS 39 and the disclosure requirements of Sections 11 and 12 of FRS 102. Under IAS 39, financial assets and liabilities are valued at their traded market price, consistent with the Prospectus.

**(ii) Initial Measurement**

Purchases and sales of financial instruments are recognised on the trade date, which is the date that the Company commits to purchase the asset. Realised gains and losses on disposal of financial instruments are calculated using the Average Cost method.

Financial instruments categorised at fair value through profit or loss are recognised initially at fair value, with transaction costs for such instruments being recognised directly in the Statement of Comprehensive Income. Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial asset or financial liability. Please see Note 3 for details.

**(iii) Subsequent Measurement**

After initial measurement, the Company measures financial instruments which are classified at fair value through profit or loss, at their fair value. Fair value is the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction. The fair value of financial instruments is based on their traded market prices on a recognised exchange or sourced from a reputable broker/counterparty in the case of non-exchange traded instruments, at the Statement of Financial Position date without any deduction for estimated future selling costs. Financial assets and financial liabilities are priced at their traded market prices.

If a traded market price is not available on a recognised stock exchange or from a broker/counterparty, the fair value of the financial instruments may be estimated by the Directors using valuation techniques, including use of recent arm's length market transactions, reference to the current fair value of another instrument that is substantially the same, discounted cash flow techniques, option pricing models or any other valuation technique that provides a reliable estimate of prices obtained in actual market transactions.

Subsequent changes in the fair value of financial instruments at fair value through profit or loss are recognised in the Statement of Comprehensive Income.

**(iv) Derecognition**

The Company derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for derecognition in accordance with FRS 102.

The Company derecognises a financial liability when the obligation specified in the contract is discharged, cancelled or expires.

**(v) Offsetting**

Financial assets and liabilities are offset and the net amount is reported in the Statement of Financial Position when there is a legally enforceable right to set-off the recognised amounts and there is an intention to settle on a net basis, or realise the assets and settle the liability simultaneously.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 1. Statement of Accounting Policies (continued)

##### *(h) Foreign Currency*

###### Functional and Presentation Currency

Transactions included in the Company's books and accounting records are measured and presented using the currency of the primary economic environment in which it operates (the "functional currency"). This is the "Euro", which reflects the Company's primary activity of investing in European securities.

Montanaro European Smaller Companies Fund, Montanaro European Income Fund, Montanaro European MidCap Fund, Montanaro Global Innovation Fund and Montanaro Better World Fund use Euro as the presentation currency, in line with the functional currency.

Montanaro UK Income Fund uses Pound Sterling rather than Euro (the functional currency of the Company) as the presentation currency for financial statement purposes as this is the principal currency for most of their Shareholders. Assets and liabilities of the Funds have been translated using the exchange rate prevailing at the Statement of Financial Position date. Income and expenses have been translated using the average exchange rate during the financial year. The difference between the financial year end and average exchange rates has resulted in a notional foreign currency translation adjustment in the Statement of Changes in Net Assets Attributable to Holders of Redeemable Participating Shares.

Foreign currency transaction gains and losses on financial instruments classified as financial assets and liabilities at fair value through profit or loss are included in the Statement of Comprehensive Income as part of gains/(losses) on financial assets and liabilities at fair value through profit or loss.

The Company Total is presented in the functional currency of the Company, Euro. Monetary assets and liabilities denominated in currencies other than Euro are translated into Euro in the accounting records at the closing rates of exchange at each financial year end date. Transactions during the financial year, including purchases and sales of securities, income and expenses, are translated at the rate of exchange prevailing on the date of the transaction. Foreign currency transaction gains and losses are included in the Statement of Comprehensive Income as part of gains/(losses) on financial assets and liabilities at fair value through profit or loss.

The foreign currency translation adjustment for the financial year ended 31 December 2022 for Montanaro UK Income Fund was a gain of £37,813,193 (31 December 2021: loss of (£49,400,358)).

The following exchange rates were used to convert the presentation currency gain of the Company:

##### **31 December 2022**

Average Euro/Pound Sterling 1.1728

Spot Euro/Pound Sterling 1.1271

##### **31 December 2021**

Average Euro/Pound Sterling 1.1628

Spot Euro/Pound Sterling 1.1910

##### *(i) Cash Flow Statement*

The Company has availed of the exemption available to open-ended investment funds under Section 7 "Statement of Cash Flows" of FRS 102 not to prepare a cash flow statement.

##### *(j) Cash and Cash Equivalents*

Cash and cash equivalents in the Statement of Financial Position comprise cash on hand and in banks that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value, with original maturities of three months or less.

##### *(k) Accrued Expenses*

Accrued expenses are measured at carrying cost which approximates their fair values.

##### *(l) Withholding Tax*

The Company currently incurs withholding taxes imposed by certain countries on investment income. Such income is recorded gross of withholding taxes in the Statement of Comprehensive Income. Withholding taxes are shown as a separate item in the Statement of Comprehensive Income.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 2. Background

Montanaro Smaller Companies Plc (the “Company” with registered number: 330162) is an open-ended umbrella variable capital investment company. The Company was incorporated on 14 July 2000 in Ireland under the laws of Ireland as an investment Company with variable capital under the laws of the Republic of Ireland and was listed on the main market of the Euronext Dublin exchange (formerly the Irish Stock Exchange) on 11 December 2000.

As at 31 December 2022, the Company had six Funds in existence (collectively the “Funds”, each a “Fund”): Montanaro European Smaller Companies Fund, Montanaro UK Income Fund, Montanaro European Income Fund, Montanaro European MidCap Fund, Montanaro Global Innovation Fund and Montanaro Better World Fund.

Montanaro European Smaller Companies Fund has eight Classes of Shares available: a Euro Accumulation Class, a Euro Class, a Euro Institutional Accumulation Class, a Euro Institutional Distribution Class, a Sterling Class, a Sterling Institutional Distribution Class, a Swedish Krona Accumulation Class and a US Dollar Class.

Montanaro UK Income Fund has five Classes of Shares available: a Euro Class, a Euro Seed Class, a Sterling Accumulation Class, a Sterling Class and a Sterling Seed Class.

Montanaro European Income Fund has three Classes of Shares available: a Euro Class, a Sterling Class and a Sterling Accumulation Class.

Montanaro European MidCap Fund has two Classes of Shares available: a Euro Distribution Class and a Euro Institutional Accumulation Class.

Montanaro Global Innovation Fund\* has four Classes of Shares available: a Euro Accumulation A Class, a Euro Accumulation B Class, a Sterling Accumulation A Class and a Sterling Accumulation B Class.

Montanaro Better World Fund has four Classes of Shares available: a Euro Distribution Class, a Euro Accumulation Class, a Sterling Distribution Class and Swedish Krona Institutional Accumulation Class.

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

#### 3. Fees

##### *Management Fee*

KBA Consulting Management Limited (the “Manager”), as per the agreement signed on 1 October 2021 between the Company and the Manager (the “Management Agreement”), shall be entitled to receive out of the assets of the Funds an annual fee in respect of such Fund or Funds or in respect of each Class of any such Fund, accrued daily, calculated monthly and payable monthly in arrears of up to and not exceeding 0.01% of the Net Asset Value of such Fund or Class as set out in the relevant Supplement. The fee payable to the Manager is subject to a minimum fee of €50,000 per annum based on a single Fund and €10,000 per annum per each additional Fund. The Manager shall be entitled to be reimbursed by the Company for reasonable out of pocket and marketing expenses incurred by it. Each Fund will bear its proportion of the fees and expenses of the Manager. Management fees charged during the financial year ended 31 December 2022 were €148,580 (31 December 2021: €45,284) of which €10,369 was payable at year end (31 December 2021: €45,284).

##### *Investment Management Fee*

The following Investment Management fees are paid to Montanaro Asset Management Limited (the “Investment Manager”):

	% of Net Assets	Minimum Subscription
<b>Montanaro European Smaller Companies Fund</b>		
Euro Accumulation Class <sup>1</sup>	1.50	N/A
Euro Class <sup>1</sup>	1.50	N/A
Euro Institutional Accumulation Class	0.50	€250,000,000
Euro Institutional Distribution Class	0.75	€50,000,000
Sterling Class <sup>1</sup>	1.50	N/A
Sterling Institutional Distribution Class	0.75	£50,000,000
Swedish Krona Accumulation Class	1.50	SEK10,000
US Dollar Class <sup>1</sup>	1.50	N/A

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 3. Fees (continued)

#### *Investment Management Fee (continued)*

	% of Net Assets	Minimum Subscription
<b>Montanaro UK Income Fund</b>		
Euro Class <sup>1</sup>	0.75	N/A
Euro Seed Class <sup>1,2</sup>	0.30	N/A
Sterling Accumulation Class <sup>1</sup>	0.75	N/A
Sterling Class <sup>1</sup>	0.75	N/A
Sterling Seed Class <sup>1,2</sup>	0.30	N/A
<b>Montanaro European Income Fund</b>		
Euro Class <sup>1</sup>	0.75	N/A
Sterling Accumulation Class <sup>1</sup>	0.75	N/A
Sterling Class <sup>1</sup>	0.75	N/A
<b>Montanaro European MidCap Fund</b>		
Euro Distribution Class <sup>1</sup>	1.50	N/A
Euro Institutional Accumulation Class	0.75	€25,000,000
<b>Montanaro Global Innovation Fund</b>		
Euro Accumulation A Class <sup>1,3</sup>	0.25	N/A
Euro Accumulation B Class <sup>1,3</sup>	0.25	N/A
Sterling Accumulation A Class <sup>1,3</sup>	0.25	N/A
Sterling Accumulation B Class <sup>1,3</sup>	0.25	N/A
<b>Montanaro Better World Fund</b>		
Euro Accumulation Class <sup>1</sup>	0.85	N/A
Euro Distribution Class <sup>1</sup>	0.85	N/A
Sterling Distribution Class <sup>1</sup>	0.85	N/A
Swedish Krona Institutional Accumulation Class <sup>4</sup>	0.50	€150,000,000

<sup>1</sup> These respective Share Classes have no minimum subscription amount required to subscribe to the Share Class as per the Prospectus.

<sup>2</sup> Effective 1 January 2022, the Management fee rate charged to Euro Seed Class and Sterling Seed Class of Montanaro UK Income fund increased from 0.25% per annum to 0.30% per annum. However, as per the Prospectus, the Investment Manager is entitled to charge a fee of up to 0.75% per annum.

<sup>3</sup> Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16. The Fund pays the Investment Manager a basic Management fee of 0.25% per annum. However, as per the Prospectus, the Investment Manager is entitled to charge a fee of up to 0.75%.

<sup>4</sup> The Swedish Krona Institutional Accumulation Class of the Fund pays the Investment Manager a basic Management fee of 0.50% per annum. However, as per the Prospectus, the Investment Manager is entitled to charge a fee of up to 0.75% in respect of the Swedish Krona Institutional Accumulation Share Class.

The Investment Management fees accrue daily on the basis of the NAV of the Funds on each dealing day and will be payable quarterly in arrears.

The Investment Manager earned an Investment Management fee of €19,760,638 for the financial year ended 31 December 2022 (31 December 2021: €23,152,324) of which €4,380,982 (31 December 2021: €6,187,968) was payable at the financial year end.

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 3. Fees (continued)

#### Performance Fees

The Investment Manager (with the exception of the Euro Institutional Accumulation Class of the Montanaro European Smaller Companies Fund, all Classes of the Montanaro UK Income Fund, all Classes of the Montanaro European Income Fund, the Euro Accumulation B Class and Sterling Accumulation B Class of the Montanaro Global Innovation Fund and all Classes of the Montanaro Better World Fund) may be entitled to receive an annual performance-related fee based on the outperformance per Share over the return on the benchmark in the relevant currency of the Share Class. The Performance fee payable will be 20%\* (plus VAT, if any) of the amount by which the increase in the NAV per Share, having adjusted the closing NAV per Share by (i) adding back the impact of any accruing Performance fee, and (ii) adding back and compounding at the rate of return of the NAV of the Share Class any dividends paid or payable by reference to the financial period in question, exceeds the higher of High Water Mark or the return on the benchmark plus 3 percentage points (plus 3 percentage points not applicable for the Montanaro Global Innovation Fund) over the relevant financial period. It will be calculated based on the time weighted average number of Shares in issue during the relevant period.

\*Effective 1 January 2022, the Performance fees payable on the Montanaro Global Innovation Fund's Euro Accumulation A Class and Sterling Accumulation A Class was changed to 10%.

A Performance fee will only be payable in respect of any financial period if the closing NAV per Share of the relevant Class at the end of the period (adjusted for the matters described above) exceeds the higher of (a) the opening NAV per Share of that Class for the relevant period or the price at which such Shares were issued if the initial issue of the relevant Class of Shares occurred during the Performance Fee Period; and (b) the closing NAV per Share of that Class on the last Performance Fee Period end when a Performance fee was paid (if any).

For the financial year ended 31 December 2022, the Investment Manager earned Performance fees of €Nil (31 December 2021: €8,885,396), of which €Nil (31 December 2021: €8,885,396) was payable at the financial year end.

#### Performance Fees table:

The following table outlines the actual amount of Performance fee charged and the percentage of the fees based on the unit class NAV during the years ended 31 December 2022 and 31 December 2021:

There were no Performance fees charged during the financial year ended 31 December 2022.

#### 31 December 2021

Sub-Fund	Share Class	Performance fee amount in Base currency of the Fund	Performance fee as % of Unit Class NAV
<b>Montanaro European Smaller Companies Fund</b>	Euro Accumulation Class	€2,171,766	1.30
	Euro Class	€1,724,340	0.98
	Euro Institutional Accumulation Class	N/A	N/A
	Euro Institutional Distribution Class	€854,221	0.59
	Sterling Class	€352,878	0.89
	Sterling Institutional Distribution Class	€627,270	1.10
	Swedish Krona Accumulation Class	€9,866	0.96
	US Dollar Class	€3,109	0.55
<b>Montanaro European MidCap Fund</b>	Euro Distribution Class	€2,560,332	1.72
	Euro Institutional Accumulation Class	€581,614	2.56

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 3. Fees (continued)

#### *Performance Fees (continued)*

The following table shows the Performance fees for the financial year ended 31 December 2022 and 31 December 2021:

	Performance fee 31 December 2022 €	Performance fee 31 December 2021 €
<b>Montanaro European Smaller Companies Fund</b>		
Euro Accumulation Class	Nil	2,171,766
Euro Class	Nil	1,724,340
Euro Institutional Accumulation Class	N/A	N/A
Euro Institutional Distribution Class	Nil	854,221
Sterling Class	Nil	352,878
Sterling Institutional Distribution Class	Nil	627,270
Swedish Krona Accumulation Class	Nil	9,866
US Dollar Class	Nil	3,109
	Performance fee 31 December 2022 £	Performance fee 31 December 2021 £
<b>Montanaro UK Income Fund</b>		
Fund N/A for Performance Fees	N/A	N/A
	Performance fee 31 December 2022 €	Performance fee 31 December 2021 €
<b>Montanaro European Income Fund</b>		
Fund N/A for Performance Fees	N/A	N/A
	Performance fee 31 December 2022 €	Performance fee 31 December 2021 €
<b>Montanaro European MidCap Fund</b>		
Euro Distribution Class	Nil	2,560,332
Euro Institutional Accumulation Class	Nil	581,614
	Performance fee 31 December 2022 €	Performance fee 31 December 2021 €
<b>Montanaro Global Innovation Fund*</b>		
Euro Accumulation A Class	Nil	Nil
Euro Accumulation B Class	N/A	N/A
Sterling Accumulation A Class	Nil	Nil
Sterling Accumulation B Class	N/A	N/A
	Performance fee 31 December 2022 €	Performance fee 31 December 2021 €
<b>Montanaro Better World Fund</b>		
Fund N/A for Performance Fees	N/A	N/A

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

## NOTES TO THE FINANCIAL STATEMENTS (continued)

## 3. Fees (continued)

*Administration and Depositary Fees*

The Company has entered into an administration agreement with BNY Mellon Fund Services (Ireland) Designated Activity Company (the “Administrator”) under which the Administrator receives an Administration fee. The Administration fee accrues daily and is paid monthly in arrears. The Administration fee was €1,029,757 for the financial year ended 31 December 2022 (31 December 2021: €1,070,825) of which €781,329 (31 December 2021: €645,547) was payable at the financial year end.

The Bank of New York Mellon SA/NV, Dublin Branch (the “Depositary”), is paid an annual fee accruing daily and paid monthly in arrears. The Depositary fee was €406,535 for the financial year ended 31 December 2022 (31 December 2021: €473,205) of which €189,833 (31 December 2021: €182,416) was payable at the financial year end.

The aggregate of the Administration and Depositary fee shall not exceed 0.25% of the NAV of each Fund.

*Directors’ Fees*

Each of the Directors who are not Directors, officers or employees of the Investment Manager and Promoter or any affiliate thereof shall be entitled to such remuneration for his or her services as the Directors may determine provided that the aggregate emoluments of all Directors in respect of any twelve month period shall not exceed £120,000 plus out of pocket expenses, or such higher amount as may be approved by the Company in general meeting. The Directors’ fees were €63,116 for the financial year ended 31 December 2022 (31 December 2021: €63,191).

*Professional Fees*

For the financial year ended 31 December 2022, Professional Fees, which principally comprised Taxation fees, Directors’ indemnity insurance premiums (D&O) and Investment Committee fees, amounted to €117,405 (31 December 2021: €76,105) of which €38,898 (31 December 2021: €26,066) was payable at the financial year end.

## 31 December 2022

	Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €	Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
Taxation fees	(6,769)	(8,363)	(3,990)	(1,437)	(168)	(20,261)	(42,433)
Directors’ indemnity insurance premiums (D&O)	(4,172)	(6,082)	(3,040)	(1,223)	(113)	(6,747)	(22,428)
Investment Committee fees	–	–	–	–	(52,544)	–	(52,544)
	<u>(10,941)</u>	<u>(14,445)</u>	<u>(7,030)</u>	<u>(2,660)</u>	<u>(52,825)</u>	<u>(27,008)</u>	<u>(117,405)</u>

\*See Note 1 Statement of Accounting Policies (h).



# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 3. Fees (continued)

#### Professional Fees (continued)

31 December 2021

	Montanaro European Smaller Companies Fund €	Montanaro UK Income Fund £	Montanaro European Income Fund €	Montanaro European MidCap Fund €	Montanaro Global Innovation Fund €	Montanaro Better World Fund €	Total* €
Taxation fees	(4,499)	(7,179)	(3,524)	(1,488)	(138)	(10,003)	(28,000)
Directors' indemnity insurance premiums (D&O)	(4,816)	(6,943)	(3,857)	(1,575)	(109)	(5,718)	(24,148)
Investment Committee fees	—	—	—	—	(13,295)	(10,662)	(23,957)
	(9,315)	(14,122)	(7,381)	(3,063)	(13,542)	(26,383)	(76,105)

\*See Note 1 Statement of Accounting Policies (h).

#### Auditor's Remuneration

Fees charged by the Independent Auditor in respect of the financial years ended 31 December 2022 and 31 December 2021 (exclusive of VAT) were:

	Statutory audit €	Other assurance services €	Tax advisory services €	Other non-audit services €
31 December 2022	48,500	—	—	4,500*
31 December 2021	48,500	—	—	—

\*Other non-audit services comprise of SFDR fees of €750 charged per sub-fund.

#### Other Expenses

Other Expenses are principally comprised of Board Meeting fees, Listing and Publishing fees, VAT costs, Index fees, Printing fees, Electronic payment fees and Rating fees. For the financial year ended 31 December 2022, other expenses totalled €503,584 (31 December 2021: €535,583). Other expenses payable at the financial year end amounted to €54,198 (31 December 2021: €26,880).

#### Transaction Costs

Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial asset or financial liability. An incremental cost is one that would not have been incurred if the entity had not acquired, issued or disposed of the financial instrument. When financial assets or financial liabilities are initially recognised at fair value through profit or loss, transaction costs for such instruments are recognised directly in profit and loss.

Transaction costs on purchases and sales of equities measured at fair value through profit or loss are included in net gains/(losses) on investments in the Statement of Financial Position for each Fund. Depositary transaction costs are included in Depositary fees in the Statement of Comprehensive Income for each Fund. These costs are separately identifiable transaction costs and the total costs incurred by each Fund during the financial year are disclosed overleaf.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 3. Fees (continued)

##### *Transaction Costs (continued)*

For the financial years ended 31 December 2022 and 31 December 2021, the Company incurred transaction costs on purchases and sales as below:

<b>Fund</b>	<b>Currency</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
Montanaro European Smaller Companies Fund	€	224,819	306,924
Montanaro UK Income Fund	£	763,498	728,251
Montanaro European Income Fund	€	141,794	61,051
Montanaro European MidCap Fund	€	111,664	103,623
Montanaro Global Innovation Fund	€	3,659	12,719
Montanaro Better World Fund	€	303,946	366,899

#### 4. Financial Assets at Fair Value through Profit or Loss

As at 31 December 2022 and 31 December 2021, the fair value of financial assets held at fair value through profit or loss are based on closing last prices which are derived from traded market prices in active markets.

#### 5. Distribution Policy

Distributions may be paid out of the net distributable income of the Company, otherwise, all income and gains of the Company will be accumulated within the Company. Montanaro European Smaller Companies Fund (with the exception of the Euro Institutional Accumulation Class and the Swedish Krona Accumulation Class), Montanaro UK Income Fund, Montanaro European Income Fund, Montanaro European MidCap Fund and Montanaro Better World Fund are registered as reporting funds under the UK Reporting Fund Regime.

In the event that the net distributable income generated by the Montanaro UK Income Fund and by the Montanaro European Income Fund during the relevant financial period and attributable to the relevant Class is insufficient to pay a distribution which is declared, the Directors may at their discretion determine such dividends may be paid from the capital of the Fund. For the financial year ended 31 December 2022 all distributions were paid out of income apart from distributions of £267,424 on the Montanaro UK Income Fund and distributions of €405,345 on the Montanaro European Income Fund. For the financial year ended 31 December 2021 all distributions were paid out of income apart from distributions of £458,426 on the Montanaro UK Income Fund and distributions of €521,725 on the Montanaro European Income Fund.

The Company made the following distributions to redeemable participating Shareholders during the financial year ended 31 December 2022 and 31 December 2021:

	<b>Montanaro European Smaller Companies Fund</b>	<b>Montanaro UK Income Fund</b>	<b>Montanaro European Income Fund</b>	<b>Montanaro European MidCap Fund</b>	<b>Montanaro Global Innovation Fund</b>	<b>Montanaro Better World Fund</b>	<b>Total*</b>
	€	£	€	€	€	€	€
31 December 2022	–	18,698,974	5,545,967	–	–	–	27,475,662
31 December 2021	–	18,148,289	4,515,443	–	–	–	25,618,922

\*See Note 1 Statement of Accounting Policies (h).

#### 6. Cash and Cash Equivalents

At the financial year end, the Company had a cash balance totalling €40,501,291 (31 December 2021: €76,809,388) with Bank of New York Mellon SA/NV, Dublin Branch.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 7. Connected Persons and Related Party Transactions

Parties are considered related if one party has the authority to control the other party or exercise significant influence over the other party in making financial or other reporting decisions, or is a member of the key management personnel of the reporting entity.

A connected person is defined as the Promoter, Manager, Trustee, Investment Adviser and/or associated or group companies of these. The Investment Manager, Manager, Administrator and Depositary are deemed to be connected persons to the Company. During the financial year, transactions were entered into with these connected persons of the Company. Details of fees paid to these entities are disclosed in Note 3.

During the financial year, the following Related Party Transactions were entered into:

Each of the Directors who are not Directors, officers or employees of the Investment Manager and Promoter or any affiliate thereof shall be entitled to such remuneration for his or her services as the Directors may determine provided that the aggregate emoluments of all Directors in respect of any twelve month period shall not exceed £120,000 plus out of pocket expenses, or such higher amount as may be approved by the Company in a general meeting. The Directors' fees were €63,116 for the financial year ended 31 December 2022 (31 December 2021: €63,191).

Cedric Durant des Aulnois, a Director of the Company, held 2,919 (31 December 2021: 2,919) Shares in the Montanaro UK Income Fund as at 31 December 2022.

No other Directors, nor the Secretary, had any interest in the Shares or deferred Shares of the Company as at 31 December 2022 and 31 December 2021.

No other Director of the Company had at any time during the financial year a material interest in any contract of significance, existing during or at the end of the financial year, in relation to the business of the Company.

The following entities are related parties, by virtue of the fact that each have the same ultimate parent group, Montanaro Asset Management Limited, which held Shares in the Company as follows:

	31 December 2022	31 December 2021
Montanaro Asset Management Limited	8,508,637	8,502,984
Montanaro Growth & Income Fund Limited Partnership No. 3	12,016,544	12,016,544

The Investment Manager has the discretion to waive some or all of its "Investment Management Fee" on certain Share Classes and information concerning the various waivers in place for the reporting period are disclosed in Note 3. As at 31 December 2022 and 31 December 2021 there were 7 Subscriber Shares of €1 each in issue (being the minimum share capital of the Company) held by the Investment Manager.

The Investment Manager agreed to waive its entitlement to any Performance fees for the Montanaro Global Innovation Fund for the years ended 31 December 2022 and 31 December 2021.

#### 8. Risks Associated with Financial Instruments

The Company's activities expose it to a variety of financial risks: market risk (including currency risk, interest rate risk, cash flow and price risk), credit risk, liquidity risk and capital risk management. The overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the Company's financial performance. Further, the Company has investment guidelines that set out its overall business strategies, its tolerance for risk and its general risk management philosophy and has established processes to monitor and control economic hedging transactions in a timely and accurate manner.

The Company's assets and liabilities comprise financial instruments which mainly include:

- Investments in equity Shares, preferred stock and collective investment schemes. These are held in accordance with the Company's investment objectives and policies;
- Cash, liquid resources and short-term debtors and creditors that arise directly from its investment activities.

The investment objectives of the Funds are as follows:

##### *Montanaro European Smaller Companies Fund*

The investment objective of the Fund is to outperform its Benchmark, the MSCI Europe SmallCap (Capital Return) Index.

##### *Montanaro UK Income Fund*

The investment objective of the Fund is to deliver capital growth and income.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 8. Risks Associated with Financial Instruments (continued)

##### *Montanaro European Income Fund*

The investment objective of the Fund is to deliver capital growth and income.

##### *Montanaro European MidCap Fund*

The investment objective of the Fund is to outperform its Benchmark, the STOXX Europe Mid 200 (Capital Return) Index.

##### *Montanaro Global Innovation Fund*

The investment objective of the Fund is to outperform its Benchmark, the MSCI World SMID Cap (Total Return) Index.

##### *Montanaro Better World Fund*

The investment objective of the Fund is to deliver long-term capital growth.

##### **Market Price Risk**

The Company trades in financial instruments, taking positions in traded instruments to take advantage of market movements in the equity markets.

All securities investments present a risk of loss of capital. Each of the Funds' overall market positions are monitored on a daily basis by the Company's Investment Manager and are reported on a monthly basis to the Directors and Designated Persons in the monthly Investment Manager's factsheet. The monthly Investment Manager's factsheet includes details of the Company's performance, relative performance, a Fund analysis, a list of the top ten holdings and a sector and country distribution analysis.

The Company's investments are in accordance with UCITS Regulations investment restrictions and also comply with the investment restrictions as disclosed in the Company's Prospectus.

The total value of investments held by the Company at the financial year end is disclosed in the Statement of Financial Position.

The Company's equity instruments are susceptible to market price risk arising from uncertainties about future prices of the instruments. The Company's market price risk is managed through diversification of the investment portfolios. In the case of each of the Funds, all invested assets are in securities traded on recognised European exchanges. At 31 December 2022 and 31 December 2021, the overall market exposures were:

	Currency	31 December 2022		31 December 2021	
			% of Net Assets at		% of Net Assets at
Securities held for trading		Fair value	Mid-Prices	Fair value	Mid-Prices
Montanaro European Smaller Companies Fund	€	395,876,138	98.48	608,443,167	97.06
Montanaro UK Income Fund	£	619,198,810	97.81	831,668,777	98.44
Montanaro European Income Fund	€	281,957,439	97.82	408,134,139	98.43
Montanaro European MidCap Fund	€	98,323,034	96.58	173,857,619	101.32
Montanaro Global Innovation Fund	€	10,968,641	98.90	16,752,880	96.51
Montanaro Better World Fund	€	599,915,022	98.59	965,716,067	97.30

## NOTES TO THE FINANCIAL STATEMENTS (continued)

## 8. Risks Associated with Financial Instruments (continued)

*Market Price Risk (continued)*

If the Company's underlying investments at 31 December 2022 had increased or decreased by 5% with all other variables held constant, this would have increased or reduced net assets attributable to holders of redeemable Shares of the Montanaro European Smaller Companies Fund by approximately €19.8m (31 December 2021: €30.4m), Montanaro UK Income Fund by approximately £31.0m (31 December 2021: £41.6m), Montanaro European Income Fund by approximately €14.1m (31 December 2021: €20.4m), Montanaro European MidCap Fund by approximately €4.9m (31 December 2021: €8.7m), Montanaro Global Innovation Fund by approximately €0.5m (31 December 2021: €0.8m) and Montanaro Better World Fund by approximately €30.0m (31 December 2021: €48.3m).

The top ten country distribution of the Company's investments at 31 December 2022 and 31 December 2021 is as follows:

31 December 2022	Montanaro European Smaller Companies Fund % of Net Assets	31 December 2022	Montanaro UK Income Fund % of Net Assets
Country		Country	
United Kingdom	29.85	United Kingdom	91.52
Sweden	14.91	Sweden	3.71
Switzerland	10.99	Singapore	1.61
Italy	10.61	Belgium	0.97
Germany	8.93		
France	5.40		
Denmark	5.25		
Netherlands	4.01		
Belgium	2.53		
Iceland	1.63		

31 December 2022	Montanaro European Income Fund % of Net Assets	31 December 2022	Montanaro European MidCap Fund % of Net Assets
Country		Country	
Italy	17.01	United Kingdom	25.98
France	16.60	France	23.38
Sweden	15.63	Italy	15.92
Norway	12.50	Switzerland	9.63
Germany	11.68	Netherlands	7.12
Switzerland	7.02	Belgium	6.88
Spain	5.03	Germany	4.37
Denmark	4.60	Denmark	3.30
Belgium	4.03		
Portugal	1.91		

**MONTANARO SMALLER COMPANIES PLC**

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

**8. Risks Associated with Financial Instruments (continued)**

*Market Price Risk (continued)*

<b>31 December 2022</b>	<b>Montanaro Global Innovation Fund % of Net Assets</b>	<b>31 December 2022</b>	<b>Montanaro Better World Fund % of Net Assets</b>
<b>Country</b>		<b>Country</b>	
United States	51.80	United States	49.53
Sweden	9.73	United Kingdom	6.13
United Kingdom	8.95	Japan	6.05
France	5.37	Sweden	6.03
Australia	4.65	Australia	5.44
Switzerland	4.19	Denmark	4.83
Israel	2.82	Switzerland	4.61
Netherlands	2.64	Netherlands	3.31
Italy	2.51	Greece	2.85
Norway	2.26	France	2.62

<b>31 December 2021</b>	<b>Montanaro European Smaller Companies Fund % of Net Assets</b>	<b>31 December 2021</b>	<b>Montanaro UK Income Fund % of Net Assets</b>
<b>Country</b>		<b>Country</b>	
United Kingdom	25.92	United Kingdom	87.01
Sweden	21.27	Sweden	4.72
Italy	9.57	Singapore	2.57
Switzerland	7.86	China	1.36
France	7.84	Norway	1.30
Germany	6.63	Belgium	1.04
Netherlands	3.73	Switzerland	0.44
Denmark	3.37		
Norway	2.68		
Belgium	1.76		

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 8. Risks Associated with Financial Instruments (continued)

#### *Market Price Risk (continued)*

31 December 2021	Montanaro European Income Fund % of Net Assets	31 December 2021	Montanaro European MidCap Fund % of Net Assets
Country		Country	
Sweden	28.91	United Kingdom	33.89
France	12.72	France	16.56
Norway	12.16	Italy	12.91
Germany	11.48	Switzerland	11.23
Italy	7.45	Netherlands	8.16
Switzerland	6.46	Belgium	6.56
Belgium	5.30	Iceland	3.46
Spain	5.28	Germany	3.42
Denmark	4.72	Sweden	2.61
Portugal	1.70	Denmark	2.52

31 December 2021	Montanaro Global Innovation Fund % of Net Assets	31 December 2021	Montanaro Better World Fund % of Net Assets
Country		Country	
United States	50.59	United States	44.31
Sweden	10.99	Sweden	7.98
United Kingdom	7.24	Switzerland	6.89
France	5.17	United Kingdom	6.43
Israel	4.56	Australia	4.85
Australia	3.50	Japan	4.39
Netherlands	2.88	Germany	3.95
Norway	2.42	Ireland	3.43
Germany	2.26	Israel	3.31
Finland	2.23	France	3.16

#### *Interest Rate Risk*

The majority of the Company's financial assets are equity shares and other instruments which neither pay interest nor have a maturity date. As a result, the Company is not subject to significant amounts of risk due to fluctuations in the prevailing levels of market interest rates. Cash balances of the Company are not subject to significant interest rate risk.

#### *Foreign Currency Risk*

Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates. In accordance with the Company's policy, the Investment Manager monitors the Company's currency position on a daily basis. The Company's currency position is reported to the Designated Persons on a monthly basis in the monthly Administrator's report and Investment Manager's reports and reported to the Directors on a quarterly basis.

The Company holds assets denominated in currencies other than their presentation currency. It is therefore exposed to currency risk, as the value of the securities denominated in other currencies will fluctuate due to changes in exchange rates. The Company's policy is not to enter into any currency hedging.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 8. Risks Associated with Financial Instruments (continued)

##### Foreign Currency Risk (continued)

The following table indicates the currencies to which the Company had significant exposure at 31 December 2022 and 31 December 2021 along with the expected movement in value of the currency given a 5% movement relative to the presentation currency:

	Montanaro European Smaller Companies Fund				Montanaro UK Income Fund			
	31 December 2022		31 December 2021		31 December 2022		31 December 2021	
	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement
	€	€	€	€	£	£	£	£
Danish Krone	21,226,277	1,061,314	21,209,783	1,060,489	—	—	—	—
Norwegian Krone	5,079,191	253,960	16,786,505	839,325	—	—	10,984,636	549,232
Pound Sterling	129,992,285	6,499,614	183,275,224	9,163,761	604,397,211	30,219,861	782,618,541	39,130,927
Swedish Krona	60,030,446	3,001,522	133,425,093	6,671,255	23,477,852	1,173,893	39,919,933	1,995,997
Swiss Franc	44,161,538	2,208,077	49,296,917	2,464,846	—	—	3,678,602	183,930
US Dollar	155,621	7,781	270,102	13,505	—	—	—	—

	Montanaro European Income Fund				Montanaro European MidCap Fund			
	31 December 2022		31 December 2021		31 December 2022		31 December 2021	
	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement
	€	€	€	€	€	€	€	€
Danish Krone	13,471,826	673,591	19,703,401	985,170	3,391,259	169,563	4,343,911	217,196
Norwegian Krone	36,073,789	1,803,689	50,456,224	2,522,811	—	—	—	—
Pound Sterling	1,296,577	64,829	1,822,109	91,105	26,851,328	1,342,566	58,510,014	2,925,501
Swedish Krona	45,071,777	2,253,589	119,894,425	5,994,721	—	—	4,471,621	223,581
Swiss Franc	20,225,430	1,011,271	26,776,749	1,338,837	9,807,475	490,374	19,268,499	963,425

	Montanaro Global Innovation Fund				Montanaro Better World Fund			
	31 December 2022		31 December 2021		31 December 2022		31 December 2021	
	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement	Net Exposure	5% movement
	€	€	€	€	€	€	€	€
Australian Dollar	515,821	25,791	607,034	30,352	33,100,192	1,655,010	48,100,883	2,405,044
Danish Krone	246,849	12,342	236,169	11,808	29,477,585	1,473,879	20,989,492	1,049,475
Israeli Shekel	92,942	4,647	—	—	—	—	—	—
Japanese Yen	—	—	—	—	36,827,346	1,841,367	43,558,621	2,177,931
New Zealand Dollar	—	—	—	—	7,120,061	356,003	12,906,417	645,321
Norwegian Krone	251,458	12,573	420,934	21,047	—	—	—	—
Pound Sterling	1,444,520	72,226	2,312,234	115,612	40,089,151	2,004,458	78,778,674	3,938,934
Swedish Krona	1,079,189	53,959	1,907,529	95,376	37,909,178	1,895,459	80,993,354	4,049,668
Swiss Franc	464,716	23,236	227,848	11,392	28,037,705	1,401,885	68,360,090	3,418,005
US Dollar	5,554,614	277,731	8,811,873	440,594	316,736,134	15,836,807	506,614,761	25,330,738

##### Credit/Counterparty Risk

Credit risk is the risk that an issuer or counterparty will be unable to meet a commitment that it has entered into with the Company. The Company's maximum exposure to credit risk (not taking into account the value of any collateral or other security held) in the event that counterparties fail to perform their obligations in relation to each Class of recognised financial assets, is the carrying amount of those assets as indicated in the Statement of Financial Position.

All transactions in traded securities are settled/paid for using approved brokers. The risk of default is considered minimal, as delivery of securities sold and receipt of payment by the broker and payment on a purchase and receipt of securities by the broker are done simultaneously. The trade will fail if either party fails to meet its obligation.

In accordance with the Company's policy, the Investment Manager monitors the Company's credit position on a daily basis and the Administrator reports on it to the Board of Directors quarterly in the Administrator's report. At 31 December 2022, the Company held cash of €40,501,291 with the Bank of New York Mellon SA/NV, Dublin Branch (31 December 2021: €76,809,388) who has a credit rating of AA- (31 December 2021: AA-) by Standard & Poor's.



NOTES TO THE FINANCIAL STATEMENTS (continued)

**8. Risks Associated with Financial Instruments (continued)**

***Credit/Counterparty Risk (continued)***

The Company's securities are maintained within the Depositary's network in segregated accounts. The Depositary is required to ensure that any agent it appoints to assist in safekeeping the assets of the Company will segregate the assets of the Company. Thus, in the event of insolvency or bankruptcy of the Depositary, the Company's assets should be segregated and protected and this should further reduce counterparty risk. The Company is, however, exposed to the risk that the Depositary or certain depositories used by the Depositary may fail. In event of the insolvency or bankruptcy of the Depositary, the Company will be treated as a general creditor of the Depositary in relation to cash holdings of the Company and as such the amount that the Company will recover is dependent on the amount of cash available to the liquidator to distribute.

***Significant concentrations of credit risk***

Concentrations of credit risk exist when changes in economic, industry or geographic factors affect counterparties whose aggregate credit exposure is significant in relation to the Company's total credit exposure. The Company's portfolio of financial instruments is broadly diversified along industry, product and geographic lines, and transactions are entered into with creditworthy counterparties, thereby mitigating any significant concentration of credit risk.

Financial assets and liabilities are offset and the net amount reported in the Statement of Financial Position when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis or realise the asset and settle the liability simultaneously. The legally enforceable right must be based on future events and must not be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Company or the counterparty. As at 31 December 2022 and 31 December 2021, the Company was not subject to master netting arrangements with its counterparties.

***Liquidity Risk***

The Company is exposed to daily cash redemptions of redeemable Shares. It therefore invests the majority of its assets in investments that are traded in an active market and can be readily disposed of.

The Company's traded securities are considered readily realisable as they are traded on recognised stock exchanges. The Company is permitted to borrow in the short term to ensure settlement. As at 31 December 2022, no such borrowings existed (31 December 2021: Nil).

In accordance with the Company's policy, the Investment Manager monitors the Company's liquidity on a daily basis. The Board of Directors receives reports on it on a quarterly basis in the Administrator's report and the Investment Manager's report.

All of the liabilities of the Company are payable in less than three months.

***Capital Risk Management***

The capital of the Company is represented by the NAV attributable to the holder of redeemable participating Shares. The amount of NAV attributable to the holder of redeemable participating Shares can change significantly on a monthly basis, as the Company is subject to daily subscriptions and redemptions at the discretion of the Shareholder. The Company's objective when managing capital is to safeguard the Company's ability to continue as a going concern in order to provide returns for the Shareholder and maintain a strong capital base to support the development of the investment activities of the Company.

Investors should note that the smaller companies market in which the Company invests may be less liquid than the market in larger capitalisation stocks and can be more sensitive to economic and other factors. As a result, the Company may experience greater volatility both in the value of its investments and in its NAV per Share than a Company investing in larger capitalisation Shares. This may be particularly relevant where positions need to be liquidated to meet redemption requests or other funding requirements.

The Directors' current intention is to make at their discretion a distribution of substantially the whole of the net income (including interest and dividend income less expenditure and liabilities) to Shareholders each calendar quarter. In the event that the net distributable income generated by the Montanaro UK Income Fund and European Income Fund during the relevant period and attributable to the relevant Class is insufficient to pay a distribution which is declared, the Directors may at their discretion determine such dividends may be paid from the capital of the Montanaro UK Income Fund and European Income Fund. Investors should note that where the payment of distributions are paid out of capital, this represents and amounts to a return or withdrawal of part of the amount originally invested or capital gains attributable to, and may result in an immediate decrease in the value of, the Shares of the relevant Class and will reduce any capital appreciation for the Shareholders of such Class.

NOTES TO THE FINANCIAL STATEMENTS (continued)

**8. Risks Associated with Financial Instruments (continued)**

***Fair Value Estimation***

Under FRS 102, the Company is required to classify fair value measurements using a fair value hierarchy that reflects the significance of the inputs used in making the measurements. The fair value hierarchy has the following levels:

- Level 1 The unadjusted traded price in an active market for identical assets or liabilities that the entity can access the measurement date.
- Level 2 Inputs other than traded prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.
- Level 3 Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

The best evidence of fair value is a traded price for an identical asset or liability in an active market and is therefore classified within Level 1. These include actively traded equities, exchange traded derivatives and other traded securities. Traded in an active market in this context means traded prices are readily and regularly available and those prices represent actual and regularly occurring market transactions on an arm's length basis.

When traded prices are unavailable, the price of a recent transaction for an identical asset or liability provides evidence of fair value and is classified within Level 2, as long as there has not been a significant change in economic circumstances or a significant lapse of time since the transaction took place. These include money market instruments, certain traded equities and open-ended collective investment schemes. If the Company can demonstrate that the last transaction price is not a good estimate of fair value (e.g. because it reflects the amount that an entity would receive or pay in a forced transaction, involuntary liquidation or distress sale), then that price is adjusted.

If the market for the asset or liability is not active and recent transactions of an identical asset or liability on their own are not a good estimate of fair value, the Company estimates the fair value by using a valuation technique and classifies the asset or liability within Level 3. These include investment-grade government and corporate bonds, over-the-counter derivatives, private equity and corporate debt securities. The objective of using a valuation technique is to estimate what the transaction price would have been on the measurement date in an arm's length exchange motivated by normal business considerations. Valuation techniques include using recent arm's length market transactions for an identical asset or liability between knowledgeable, willing parties, if available, reference to the current fair value of another asset or liability that is substantially the same as the asset or liability being measured, discounted cash flow analysis and option pricing model. If there is a valuation technique commonly used by market participants to price the asset or liability and that technique has been demonstrated to provide reliable estimates of prices obtained in actual market transactions, the Company uses that technique.

The Company's investments values are based on traded market prices in active markets and therefore all of the Company's investments were classified as Level 1 at 31 December 2022 and 31 December 2021. There were no transfers between levels during the financial year. The Company does not hold any investments classified within Level 2 or Level 3. The fair value levels of the securities held by the Funds are monitored on a monthly basis by the Investment Manager. There were no financial liabilities held at 31 December 2022 and 31 December 2021.

**9. Soft Commission Arrangements**

No soft commission arrangements were entered into during the financial years ended 31 December 2022 and 31 December 2021.

**10. Efficient Portfolio Management**

The Company may, on behalf of a Fund, use techniques and instruments for the purposes of efficient portfolio management (including but not limited to forward foreign currency contracts, futures contracts, options, put and call options on securities, indices and currencies, stock index contracts, swap contracts) subject to the restrictions and limitations laid down by the Central Bank. The Company may engage in such techniques and instruments for the reduction of risk, cost or the generation of additional capital or income for a Fund with an appropriate level of risk, taking into account the risk profile of the Company as described in the Prospectus and the general provisions of the UCITS Regulations.

The Company may employ techniques and instruments relating to transferable securities provided that such techniques and instruments are used for efficient portfolio management purposes and techniques and instruments intended to provide protection against exchange rate risk and equity market risk. Where applicable, the entities to which direct and indirect operational costs and/or fees have been paid during the annual period to the relevant accounting year end of a Fund will be disclosed in the annual report for such period.

The prices of derivative instruments, including futures and options prices, are highly volatile. Price movements of forward foreign currency contracts, futures contracts and other derivative contracts are influenced by, among other things, interest

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

**10. Efficient Portfolio Management (continued)**

rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programmes and policies of governments, and national and international political and economic events and policies. In addition, governments from time to time intervene, directly and by regulation, in certain markets, particularly markets in currencies and interest rate related futures and options. Such intervention often is intended directly to influence prices and may, together with other factors, cause all of such markets to move rapidly in the same direction because of, among other things, interest rate fluctuations.

The use of such techniques and instruments for efficient portfolio management involves certain special risks including: a dependence on the ability to predict movements in the prices of securities being hedged and movements in interest rates, imperfect correlations between the hedging instruments and the securities or market sectors being hedged, the fact that skills needed to use these instruments are different from those needed to select the Company's securities, the possible absence of a liquid market for any particular instrument at any particular time and possible impediments to effective portfolio management such as the ability to meet redemption requests or other short term obligations because of the percentage of the Company's assets being segregated to cover its obligations.

The Company does not currently use financial derivative instruments and it is not the current intention of the Investment Manager to employ efficient portfolio management techniques. A risk management process will be submitted to the Central Bank in accordance with the Central Bank's requirements prior to the Company engaging in financial derivative transactions on behalf of a Fund.

The Company did not enter into any derivative contracts during the financial years ended 31 December 2022 or 31 December 2021 for efficient portfolio management or any other purpose.

**11. Share Capital and Redeemable Participating Shares**

The authorised share capital of the Company is 1,000,000,000 redeemable participating Shares of no par value. The redeemable participating Shares issued by the Company are freely transferable and are entitled to participate equally in the profits and dividends of the relevant Fund and its assets upon liquidation. The redeemable participating Shares, which are of no par value and which must be fully paid up on issue, carry no preferential or pre-emptive rights. Holders of redeemable participating Shares are entitled on a poll to one vote at general meetings of the Company in respect of each redeemable participating Share held.

**Subscriber Shares**

The Company has authorised share capital of €38,100 (divided into 38,100 Subscriber Shares of one Euro each). As at 31 December 2022 and 31 December 2021 there were 7 Subscriber Shares of €1 each in issue (being the minimum share capital of the Company) held by the Investment Manager. Subscriber Shares do not entitle the holders to any dividend and on a winding-up entitle the holder to receive the amount paid thereon but not otherwise to participate in the assets of the Company. The Subscriber Shares do not form part of redeemable participating Shareholders' Funds. They are thus disclosed by way of this note only. In the opinion of the Directors, this disclosure reflects the nature of the Company's business as an investment fund.

**Redemption of Shares**

Shareholders may redeem their Shares on and with effect from any dealing day at the NAV per Share calculated on or with respect to the relevant dealing day in accordance with the procedures specified in the relevant Supplement (save during any period when the calculation of NAV is suspended). If the redemption of part only of a Shareholder's shareholding would leave the Shareholder holding less than the Minimum Holding for the relevant Fund, the Directors or their delegates may, if they think fit, redeem the whole of that Shareholder's holding.

In the event that the net distributable income generated by the Montanaro UK Income Fund and by the Montanaro European Income Fund during the relevant financial period and attributable to the relevant Class is insufficient to pay a distribution which is declared, the Directors may at their discretion determine such dividends may be paid from the capital of the Fund. Shareholders should note that where the payment of distributions are paid out of capital, this represents and amounts to a return or withdrawal of part of the amount originally invested or capital gains attributable to and may result in an immediate decrease in the value of the Shares of the relevant Class and will reduce any capital appreciation for the Shareholders of such Class.

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 11. Share Capital and Redeemable Participating Shares (continued)

#### Share Classes

Shares will be issued to investors as Shares of a Class in the Funds. The Directors may, whether on the establishment of each Fund or from time to time, with prior notification to, and clearance by the Central Bank, create more than one Class of Shares in each of the Funds. The Directors may, in their absolute discretion, differentiate between Classes of Shares, without limitation, as to currency denomination of a particular Class, dividend policy, hedging strategies if any applied to the designated currency of particular Classes, fees and expenses or the minimum subscription or minimum holding applicable.

Where the amount subscribed for Shares is not equivalent to an exact number of Shares, fractions of Shares may be issued to the nearest one thousandth of a Share. The holder of a fraction of a Share may not exercise any voting right in respect of such Share.

#### 31 December 2022

	Shares in issue at beginning of financial year	Subscriptions	Redemptions	Shares in issue at end of financial year
<b>Montanaro European Smaller Companies Fund</b>				
Euro Accumulation Class	17,338,780	4,070,310	(3,010,953)	18,398,137
Euro Class	17,617,147	906,438	(1,534,918)	16,988,667
Euro Institutional Accumulation Class	3,615,503	1,982,109	(1,359,397)	4,238,215
Euro Institutional Distribution Class	14,192,708	4,989,523	(6,526,760)	12,655,471
Sterling Class	3,936,898	140,542	(183,131)	3,894,309
Sterling Institutional Distribution Class	5,390,007	507,753	(2,333,646)	3,564,114
Swedish Krona Accumulation Class	317,630	–	–	317,630
US Dollar Class	117,873	4,130	(49,030)	72,973
<b>Montanaro UK Income Fund</b>				
Euro Class	2,693,066	30,291	(1,087,823)	1,635,534
Euro Seed Class	963,224	54,901	(194,751)	823,374
Sterling Accumulation Class	155,640,408	37,493,758	(20,054,910)	173,079,256
Sterling Class	182,236,811	59,632,483	(55,303,300)	186,565,994
Sterling Seed Class	143,214,741	34,673,001	(40,790,068)	137,097,674
<b>Montanaro European Income Fund</b>				
Euro Class	13,137,238	1,867,917	(1,519,298)	13,485,857
Sterling Accumulation Class	123,861,930	4,464,677	(25,453,129)	102,873,478
Sterling Class	58,890,038	15,588,258	(15,975,975)	58,502,321
<b>Montanaro European MidCap Fund</b>				
Euro Distribution Class	44,873,516	3,383,592	(8,680,225)	39,576,883
Euro Institutional Accumulation Class	6,453,262	1,653	(3,411,803)	3,043,112
<b>Montanaro Global Innovation Fund*</b>				
Euro Accumulation A Class	1,750,574	22,789	(520,268)	1,253,095
Euro Accumulation B Class	1,103,715	5,920	–	1,109,635
Sterling Accumulation A Class	2,059,553	1,145,434	(820,124)	2,384,863
Sterling Accumulation B Class	3,509,837	162,175	(276,137)	3,395,875
<b>Montanaro Better World Fund</b>				
Euro Accumulation Class	12,348,839	13,364,311	(4,307,904)	21,405,246
Euro Distribution Class	62,174,463	38,006,799	(7,269,773)	92,911,489
Sterling Distribution Class	217,423,128	48,766,476	(77,585,178)	188,604,426
Swedish Krona Institutional Accumulation Class	193,947,696	41,952,749	(94,508,000)	141,392,445

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 11. Share Capital and Redeemable Participating Shares (continued)

31 December 2021

	Shares in issue at beginning of financial year	Subscriptions	Redemptions	Shares in issue at end of financial year
<b>Montanaro European Smaller Companies Fund</b>				
Euro Accumulation Class	22,563,500	1,499,200	(6,723,920)	17,338,780
Euro Class	18,586,796	721,153	(1,690,802)	17,617,147
Euro Institutional Accumulation Class	3,272,291	911,004	(567,792)	3,615,503
Euro Institutional Distribution Class	3,593,473	11,435,762	(836,527)	14,192,708
Sterling Class	3,748,961	548,858	(360,921)	3,936,898
Sterling Institutional Distribution Class	3,379,783	3,176,921	(1,166,697)	5,390,007
Swedish Krona Accumulation Class	317,630	–	–	317,630
US Dollar Class	83,440	50,100	(15,667)	117,873
<b>Montanaro UK Income Fund</b>				
Euro Class	191,387	2,817,338	(315,659)	2,693,066
Euro Seed Class	1,376,248	61,766	(474,790)	963,224
Sterling Accumulation Class	165,379,710	32,579,040	(42,318,342)	155,640,408
Sterling Class	170,999,977	64,540,042	(53,303,208)	182,236,811
Sterling Seed Class	164,999,658	38,627,136	(60,412,053)	143,214,741
<b>Montanaro European Income Fund</b>				
Euro Class	11,769,354	2,430,137	(1,062,253)	13,137,238
Sterling Accumulation Class	153,550,581	15,123,307	(44,811,958)	123,861,930
Sterling Class	76,040,856	19,711,608	(36,862,426)	58,890,038
<b>Montanaro European MidCap Fund</b>				
Euro Distribution Class	54,083,224	828,402	(10,038,110)	44,873,516
Euro Institutional Accumulation Class	9,650,854	618,145	(3,815,737)	6,453,262
<b>Montanaro Global Innovation Fund*</b>				
Euro Accumulation A Class	–	1,769,447	(18,873)	1,750,574
Euro Accumulation B Class	1,572,874	7,713	(476,872)	1,103,715
Sterling Accumulation A Class	–	2,584,296	(524,743)	2,059,553
Sterling Accumulation B Class	2,327,849	1,810,833	(628,845)	3,509,837
<b>Montanaro Better World Fund</b>				
Euro Accumulation Class	2,248,901	23,590,746	(13,490,808)	12,348,839
Euro Distribution Class	79,716,117	29,537,411	(47,079,065)	62,174,463
Sterling Distribution Class	173,218,631	101,998,067	(57,793,570)	217,423,128
Swedish Krona Institutional Accumulation Class	163,274,408	41,739,790	(11,066,502)	193,947,696

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 12. Exchange Rates

The exchange rates to Euro (€) at the financial years ended 31 December 2022 and 31 December 2021 are as follows:

	31 December 2022	31 December 2021
Australian Dollar	1.5738	1.5641
Danish Krone	7.4364	7.4376
Israeli New Shekel	3.7658	3.5394
Japanese Yen	140.8184	130.9543
New Zealand Dollar	1.6875	1.6610
Norwegian Krone	10.5135	10.0282
Pound Sterling	0.8872	0.8340
Swedish Krona	11.1202	10.2960
Swiss Franc	0.9874	1.0362
US Dollar	1.0673	1.1372

#### 13. Taxation

Under current law and practice, the Company qualifies as an investment undertaking as defined in Section 739B of the Taxes Consolidation Act, 1997, as amended. On that basis, it is not liable to Irish tax on its income or gains. However, Irish tax may arise on the happening of a "chargeable event". A chargeable event includes any distribution payments to Shareholders, any encashment, redemption, cancellation or transfer of Shares and the holding of Shares at the end of each eight year period beginning with the acquisition of such Shares.

No Irish tax will arise on the Company in respect of chargeable events in respect of:

- (a) a Shareholder who is neither Irish resident nor ordinarily resident in Ireland for tax purposes, at the time of the chargeable event, provided appropriate valid declarations in accordance with the provisions of the Taxes Consolidation Act, 1997, as amended, are held by the Fund; and
- (b) certain exempted Irish tax resident Shareholders who have provided the Fund with the necessary signed statutory declarations.

Dividends, interest and capital gains (if any) received on investments made by the Company may be subject to withholding taxes imposed by the country from which the investment income/gains are received and such taxes may not be recoverable by the Fund or its Shareholders.

#### 14. Comparatives

The comparative financial statements relate to the financial year ended 31 December 2021.

#### 15. Net Asset Value per Redeemable Participating Share at last traded price

The below share classes are unhedged.

##### 31 December 2022

	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro European Smaller Companies Fund</b>			
Euro Accumulation Class	€118,027,059	18,398,137	€6.415
Euro Class	€113,506,114	16,988,667	€6.681
Euro Institutional Accumulation Class	€31,021,290	4,238,215	€7.319
Euro Institutional Distribution Class	€86,992,758	12,655,471	€6.874
Sterling Class	£23,290,718	3,894,309	£5.981
Sterling Institutional Distribution Class	£22,436,455	3,564,114	£6.295
Swedish Krona Accumulation Class	SEK7,612,505	317,630	SEK23.967
US Dollar Class	\$247,237	72,973	\$3.388

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 15. Net Asset Value per Redeemable Participating Share at last traded price (continued)

31 December 2022 (continued)	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro UK Income Fund</b>			
Euro Class	€1,356,913	1,635,534	€0.830
Euro Seed Class	€979,363	823,374	€1.189
Sterling Accumulation Class	£178,835,152	173,079,256	£1.033
Sterling Class	£195,665,060	186,565,994	£1.049
Sterling Seed Class	£256,508,522	137,097,674	£1.871
<b>Montanaro European Income Fund</b>			
Euro Class	€16,325,271	13,485,857	€1.211
Sterling Accumulation Class	£122,608,600	102,873,478	£1.192
Sterling Class	£118,651,401	58,502,321	£2.028
<b>Montanaro European MidCap Fund</b>			
Euro Distribution Class	€94,062,595	39,576,883	€2.377
Euro Institutional Accumulation Class	€7,738,882	3,043,112	€2.543
<b>Montanaro Global Innovation Fund*</b>			
Euro Accumulation A Class	€936,997	1,253,095	€0.748
Euro Accumulation B Class	€1,744,397	1,109,635	€1.572
Sterling Accumulation A Class	£1,828,161	2,384,863	£0.767
Sterling Accumulation B Class	£5,633,068	3,395,875	£1.659
<b>Montanaro Better World Fund</b>			
Euro Accumulation Class	€19,575,390	21,405,246	€0.915
Euro Distribution Class	€129,292,889	92,911,489	€1.392
Sterling Distribution Class	£266,931,001	188,604,426	£1.415
Swedish Krona Institutional Accumulation Class	SEK1,765,752,114	141,392,445	SEK12.488

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

31 December 2021	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro European Smaller Companies Fund</b>			
Euro Accumulation Class	€167,004,517	17,338,780	€9.632
Euro Class	€176,723,871	17,617,147	€10.031
Euro Institutional Accumulation Class	€39,336,254	3,615,503	€10.880
Euro Institutional Distribution Class	€145,382,096	14,192,708	€10.243
Sterling Class	£33,453,609	3,936,898	£8.497
Sterling Institutional Distribution Class	£47,848,193	5,390,007	£8.877
Swedish Krona Accumulation Class	SEK10,582,375	317,630	SEK33.317
US Dollar Class	\$638,920	117,873	\$5.420
<b>Montanaro UK Income Fund</b>			
Euro Class	€3,241,039	2,693,066	€1.203
Euro Seed Class	€1,654,354	963,224	€1.718
Sterling Accumulation Class	£212,307,674	155,640,408	£1.364
Sterling Class	£262,356,612	182,236,811	£1.440
Sterling Seed Class	£366,110,815	143,214,741	£2.556

# MONTANARO SMALLER COMPANIES PLC

## NOTES TO THE FINANCIAL STATEMENTS (continued)

### 15. Net Asset Value per Redeemable Participating Share at last traded price (continued)

#### 31 December 2021 (continued)

	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro European Income Fund</b>			
Euro Class	€21,180,388	13,137,238	€1.612
Sterling Accumulation Class	£179,851,490	123,861,930	£1.452
Sterling Class	£150,501,903	58,890,038	£2.556
<b>Montanaro European MidCap Fund</b>			
Euro Distribution Class	€148,856,591	44,873,516	€3.317
Euro Institutional Accumulation Class	€22,733,478	6,453,262	€3.523
<b>Montanaro Global Innovation Fund*</b>			
Euro Accumulation A Class	€1,995,312	1,750,574	€1.140
Euro Accumulation B Class	€2,645,591	1,103,715	€2.397
Sterling Accumulation A Class	£2,277,470	2,059,553	£1.106
Sterling Accumulation B Class	£8,400,761	3,509,837	£2.393
<b>Montanaro Better World Fund</b>			
Euro Accumulation Class	€16,938,137	12,348,839	€1.372
Euro Distribution Class	€129,778,735	62,174,463	€2.087
Sterling Distribution Class	£436,782,881	217,423,128	£2.009
Swedish Krona Institutional Accumulation Class	SEK3,351,963,391	193,947,696	SEK17.283

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

#### 31 December 2020

	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro European Smaller Companies Fund</b>			
Euro Accumulation Class	€168,279,466	22,563,500	€7.458
Euro Class	€144,151,800	18,586,796	€7.756
Euro Institutional Accumulation Class	€27,000,176	3,272,291	€8.251
Euro Institutional Distribution Class	€28,248,835	3,593,473	€7.861
Sterling Class	£26,242,010	3,748,961	£7.000
Sterling Institutional Distribution Class	£24,573,874	3,379,783	£7.271
Swedish Krona Accumulation Class	SEK7,984,736	317,630	SEK25.138
US Dollar Class	\$376,233	83,440	\$4.509
<b>Montanaro UK Income Fund</b>			
Euro Class	€179,426	191,387	€0.938
Euro Seed Class	€1,832,250	1,376,248	€1.331
Sterling Accumulation Class	£181,678,197	165,379,710	£1.099
Sterling Class	£204,473,323	170,999,977	£1.196
Sterling Seed Class	£348,652,543	164,999,658	£2.113
<b>Montanaro European Income Fund</b>			
Euro Class	€15,314,403	11,769,354	€1.301
Sterling Accumulation Class	£187,535,301	153,550,581	£1.221
Sterling Class	£167,220,441	76,040,856	£2.199
<b>Montanaro European MidCap Fund</b>			
Euro Distribution Class	€141,355,961	54,083,224	€2.614
Euro Institutional Accumulation Class	€26,724,840	9,650,854	€2.769



## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 15. Net Asset Value per Redeemable Participating Share at last traded price (continued)

31 December 2020 (continued)	Net Assets for dealing	Shares in issue	NAV per Share
<b>Montanaro Global Innovation Fund*</b>			
Euro Accumulation B Class	€2,895,572	1,572,874	€1.841
Sterling Accumulation B Class	£4,565,064	2,327,849	£1.961
<b>Montanaro Better World Fund</b>			
Euro Accumulation Class	€2,410,386	2,248,901	€1.072
Euro Distribution Class	€130,077,407	79,716,117	€1.632
Sterling Distribution Class	£290,000,908	173,218,631	£1.674
Swedish Krona Institutional Accumulation Class	SEK2,145,314,829	163,274,408	SEK13.139

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

#### 16. Events during the Financial Year

An updated Prospectus and Supplements were issued on 1 January 2022 to incorporate amendments including:

- updates to the sustainable finance investment descriptions in order to add disclosure required by Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 ("Taxonomy Regulation");
- for Funds which pay a performance fee, the methodology has been reviewed for consistency with the Central Bank's requirements and guidelines. The description and operation of each performance fee methodology was updated to make it clear that it is high water mark based. In addition, concrete examples have been added to outline how the performance fee operates in a range of scenarios;
- amending the dividend policy of the Euro Distribution and Sterling Distribution share classes for the Montanaro Global Innovation Fund to note they would cease to pay any dividends and have been reclassified as accumulation share classes;
- amending the fee structures of the Montanaro Global Innovation Fund with the intention of reducing fees and to include an overall cap on "Ongoing Charges" as defined in the Supplement by introducing a discretionary arrangement through which the Investment Manager will seek to limit the Ongoing Charges Figure through reducing its own Management fee or subsidising the Fund, if necessary;
- other minor and general amendments were made throughout.

Effective 1 January 2022, the names of the share classes of the Montanaro Global Innovation Fund changed as follows:

Euro Accumulation Class changed to	Euro Accumulation A Class
Euro Distribution Class changed to	Euro Accumulation B Class
Sterling Accumulation Class changed to	Sterling Accumulation A Class
Sterling Distribution Class changed to	Sterling Accumulation B Class

Effective 1 January 2022, the Management fee rate charged to Euro Seed Class and Sterling Seed Class of Montanaro UK Income Fund increased from 0.25% per annum to 0.30% per annum.

On 28 October 2022, the Manager became a member of the Waystone Group and, on 12 December 2022, changed their address to 35 Shelbourne Road, 4<sup>th</sup> Floor, Ballsbridge, Dublin, D04 A4E, Ireland.

The invasion of Ukraine by Russia on 24 February 2022 has created extensive uncertainty on the political and economic front with sanctions being imposed on Russia and allies such as Belarus. The Directors, the Manager and the Investment Manager continue to monitor the sanctions activity globally to ensure the portfolios are in adherence. Currently the funds are not exposed to Russian or Ukrainian assets, nor any other sanctioned holdings. The Directors, the Manager and the Investment Manager, in conjunction with the Administrator, monitor the investor base with respect to sanctions and, if any sanctioned investors are identified, will ensure timely remediation in line with appropriate policies and procedures in place.

Updated Prospectus and Supplements were issued on 25 November 2022 to incorporate the level 2 SFDR requirements to pre-contractual documentation disclosures for the financial products.

There were no other significant events affecting the Company during the financial period.

## MONTANARO SMALLER COMPANIES PLC

### NOTES TO THE FINANCIAL STATEMENTS (continued)

#### 17. Events since the Financial Year End

Effective 1 January 2023, the Investment Management fee rate charged to Euro Seed Class and Sterling Seed Class of Montanaro UK Income Fund increased from 0.30% per annum to 0.35% per annum.

Effective 1 January 2023, the Investment Management fee rate charged to Euro Accumulation A Class and Sterling Accumulation A Class of the Montanaro Global Innovation Fund increased from 0.25% per annum to 0.55% per annum, while the Investment Management fee rate charged to Euro Accumulation B Class and Sterling Accumulation B Class increased from 0.25% per annum to 0.75% per annum.

Effective 1 January 2023, the Performance fee charged to Euro Accumulation A Class and Sterling Accumulation A Class of the Montanaro Global Innovation Fund is 10% of outperformance. Prior to this date, Performance fees were waived.

The following distributions were approved by the Directors during the financial period ending 31 December 2022:

#### Ex-Date of 30 January 2023:

##### Montanaro UK Income Fund

Share Class	Rate per Share	Distribution
Euro Class	€0.007093	€11,601
Euro Seed Class	€0.010671	€8,367
Sterling Class	£0.009422	£1,654,392
Sterling Seed Class	£0.017412	£2,167,261

##### Montanaro European Income Fund

Share Class	Rate per Share	Distribution
Euro Class	€0.007327	€98,617
Sterling Class	£0.016281	£675,109

There were no other significant events affecting the Company since the financial year end.

#### 18. Commitments and Contingent Liabilities

As at 31 December 2022 and 31 December 2021 there were no commitments or contingent liabilities.

#### 19. Valuation Date

The financial statements have been prepared on the last Net Asset Value of the financial year which has been calculated on 30 December 2022 with a price of that date.

#### 20. Approval of Financial Statements

These financial statements were approved by the Directors of the Company on 23 March 2023.

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS MONTANARO EUROPEAN SMALLER COMPANIES FUND

As at 31 December 2022

Shares	Description	Fair value €	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Belgium (31 December 2021: 1.76%)</b>			
125,000	Melexis NV	10,187,500	2.53
		<b>10,187,500</b>	<b>2.53</b>
<b>Denmark (31 December 2021: 3.37%)</b>			
135,000	Chr Hansen Holding A/S	9,071,475	2.25
84,717	Chemometec A/S	7,866,273	1.96
65,000	SimCorp A/S	4,179,821	1.04
		<b>21,117,569</b>	<b>5.25</b>
<b>Finland - Nil (31 December 2021: 1.70%)</b>			
<b>France (31 December 2021: 7.84%)</b>			
40,000	Sartorius Stedim Biotech	12,156,000	3.03
60,000	Esker SA	9,534,000	2.37
		<b>21,690,000</b>	<b>5.40</b>
<b>Germany (31 December 2021: 6.63%)</b>			
70,000	MTU Aero Engines AG	14,154,000	3.52
200,000	CTS Eventim AG & Co KGaA	11,920,000	2.97
13,000	Rational AG	7,215,000	1.79
210,000	hGears AG	1,520,400	0.38
11,000	Hypoport SE	1,071,400	0.27
		<b>35,880,800</b>	<b>8.93</b>
<b>Iceland (31 December 2021: 1.52%)</b>			
2,000,000	Marel HF '144A'	6,560,000	1.63
		<b>6,560,000</b>	<b>1.63</b>
<b>Italy (31 December 2021: 9.57%)</b>			
220,000	Moncler SpA	10,914,200	2.72
1,000,000	Brembo SpA	10,490,000	2.61
90,000	Reply SpA	9,738,000	2.42
260,000	Carel Industries SpA '144A'	6,123,000	1.52
800,000	Technoprobe SpA	5,392,000	1.34
		<b>42,657,200</b>	<b>10.61</b>
<b>Netherlands (31 December 2021: 3.73%)</b>			
120,000	IMCD NV	16,098,000	4.01
		<b>16,098,000</b>	<b>4.01</b>
<b>Norway (31 December 2021: 2.68%)</b>			
500,000	PhotoCure ASA	5,079,190	1.26
		<b>5,079,190</b>	<b>1.26</b>

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS

### MONTANARO EUROPEAN SMALLER COMPANIES FUND (continued)

As at 31 December 2022

Shares	Description	Fair value €	% of net assets
<b>Singapore (31 December 2021: 1.36%)</b>			
175,000	XP Power Ltd	4,013,892	1.00
		<b>4,013,892</b>	<b>1.00</b>
<b>Spain (31 December 2021: 0.92%)</b>			
600,000	Merlin Properties Socimi SA (REIT)	5,283,000	1.31
		<b>5,283,000</b>	<b>1.31</b>
<b>Sweden (31 December 2021: 21.27%)</b>			
2,000,000	Fortnox AB	8,569,976	2.13
500,000	AAK AB	8,061,892	2.00
200,000	MIPS AB	7,717,474	1.92
375,000	Thule Group AB '144A'	7,368,336	1.83
500,000	Sectra AB	6,736,379	1.67
325,000	Biotage AB	5,456,503	1.36
350,000	Hufvudstaden AB	4,699,098	1.17
300,010	Surgical Science Sweden AB	4,494,666	1.12
200,000	Avanza Bank Holding AB	4,046,683	1.01
150,000	Plejd AB	2,803,002	0.70
		<b>59,954,009</b>	<b>14.91</b>
<b>Switzerland (31 December 2021: 7.86%)</b>			
25,000	Tecan Group AG	10,481,858	2.61
140,000	VZ Holding AG	10,194,240	2.54
22,000	Belimo Holding AG	9,914,724	2.47
110,000	Bachem Holding AG	8,934,392	2.22
30,000	Kardex Holding AG	4,636,324	1.15
		<b>44,161,538</b>	<b>10.99</b>
<b>United Kingdom (31 December 2021: 25.92%)</b>			
300,000	4imprint Group Plc	14,455,084	3.60
600,000	Kainos Group Plc	10,434,711	2.60
325,000	Diploma Plc	10,168,715	2.53
80,000	Spirax-Sarco Engineering Plc	9,571,351	2.38
250,000	Cranswick Plc	8,673,050	2.16
3,650,000	NCC Group Plc	8,227,845	2.05
350,000	Halma Plc	7,787,148	1.94
600,000	St James's Place Plc	7,405,061	1.84
2,250,000	Marshalls Plc	6,928,296	1.72
70,000	Games Workshop Group Plc	6,757,540	1.68
1,500,000	IntegraFin Holdings Plc	5,109,154	1.27
1,750,000	Advanced Medical Solutions Group Plc	5,108,590	1.27
160,000	Dechra Pharmaceuticals Plc	4,721,205	1.17
125,000	Clarkson Plc	4,557,719	1.13
350,000	RS GROUP Plc	3,532,620	0.88
800,000	Shaftesbury Plc (REIT)	3,318,189	0.83

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO EUROPEAN SMALLER COMPANIES FUND (continued)**

*As at 31 December 2022*

<b>Shares</b>	<b>Description</b>	<b>Fair value €</b>	<b>% of net assets</b>
<b>United Kingdom (31 December 2021: 25.92%) (continued)</b>			
250,000	Big Yellow Group Plc (REIT)	3,231,965	0.80
		<b>119,988,243</b>	<b>29.85</b>
<b>United States (31 December 2021: 0.93%)</b>			
650,000	MaxCyte Inc	3,205,197	0.80
		<b>3,205,197</b>	<b>0.80</b>
<b>Total equities</b>		<b>395,876,138</b>	<b>98.48</b>
<b>Total financial assets at fair value through profit or loss</b>		<b>395,876,138</b>	<b>98.48</b>
Cash and cash equivalents		6,844,192	1.70
Other net liabilities		(717,695)	(0.18)
<b>Total net assets attributable to holders of redeemable participating Shares</b>		<b>402,002,635</b>	<b>100.00</b>

	<b>% of Total Assets</b>
<b>Analysis of Total Assets</b>	
Financial assets at fair value through profit or loss	96.44
Cash and cash equivalents	1.70
Other assets	1.86
<b>Total assets</b>	<b>100.00</b>

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS MONTANARO UK INCOME FUND

As at 31 December 2022

Shares	Description	Fair value £	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Belgium (31 December 2021: 1.04%)</b>			
85,000	Melexis NV	6,146,293	0.97
		<b>6,146,293</b>	<b>0.97</b>
<b>China - Nil (31 December 2021: 1.36%)</b>			
<b>Norway - Nil (31 December 2021: 1.30%)</b>			
<b>Singapore (31 December 2021: 2.57%)</b>			
500,000	XP Power Ltd	10,175,000	1.61
		<b>10,175,000</b>	<b>1.61</b>
<b>Sweden (31 December 2021: 4.72%)</b>			
3,325,000	NCAB Group AB	17,376,263	2.75
350,000	Thule Group AB '144A'	6,101,589	0.96
		<b>23,477,852</b>	<b>3.71</b>
<b>Switzerland - Nil (31 December 2021: 0.44%)</b>			
<b>United Kingdom (31 December 2021: 87.01%)</b>			
274,847	Games Workshop Group Plc	23,540,646	3.72
532,500	4imprint Group Plc	22,764,375	3.60
1,425,000	Kainos Group Plc	21,987,750	3.47
1,750,000	Big Yellow Group Plc (REIT)	20,072,500	3.17
700,000	Diploma Plc	19,432,000	3.07
600,000	Clarkson Plc	19,410,000	3.07
925,000	Rathbones Group Plc	18,823,750	2.97
2,575,000	DiscoverIE Group Plc	18,823,250	2.97
1,675,000	St James's Place Plc	18,341,250	2.90
675,000	Severn Trent Plc	17,894,250	2.83
8,500,000	NCC Group Plc	17,000,000	2.69
3,650,000	Bloomsbury Publishing Plc	16,406,750	2.59
650,000	Greggs Plc	15,249,000	2.41
15,000,000	Taylor Wimpey Plc	15,247,500	2.41
700,000	Admiral Group Plc	14,959,000	2.36
2,000,000	Sage Group Plc/The	14,912,000	2.36
1,900,000	Britvic Plc	14,763,000	2.33
5,400,000	Marshalls Plc	14,752,800	2.33
1,950,000	FDM Group Holdings Plc	14,605,500	2.31
2,150,000	Vistry Group Plc	13,448,250	2.12
1,200,000	Liontrust Asset Management Plc	13,440,000	2.12
7,500,000	LondonMetric Property Plc (REIT)	12,922,500	2.04
1,350,000	RS GROUP Plc	12,089,250	1.91
10,500,000	Primary Health Properties Plc (REIT)	11,634,000	1.84
1,150,000	United Utilities Group Plc	11,401,100	1.80
4,000,000	Spirent Communications Plc	10,408,000	1.64
250,000	Intertek Group Plc	10,085,000	1.59
925,000	Hiscox Ltd	10,077,875	1.59
7,125,000	XPS Pensions Group Plc	9,903,750	1.56
362,111	Dechra Pharmaceuticals Plc	9,480,066	1.50
1,650,000	Hilton Food Group Plc	9,190,500	1.45
2,250,000	Biffa Plc '144A'	9,166,500	1.45
3,000,000	IntegraFin Holdings Plc	9,066,000	1.43
6,750,000	Jupiter Fund Management Plc	8,964,000	1.42

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**  
**MONTANARO UK INCOME FUND (continued)**

*As at 31 December 2022*

Shares	Description	Fair value £	% of net assets
<b>United Kingdom (31 December 2021: 87.01%) (continued)</b>			
1,775,000	Ricardo Plc	8,537,750	1.35
1,025,000	Savills Plc	8,461,375	1.34
2,000,000	SThree Plc	8,060,000	1.27
5,500,000	Tritax Big Box REIT Plc (REIT)	7,623,000	1.20
825,000	Pennon Group Plc	7,330,125	1.16
2,535,455	Genuit Group Plc	7,124,628	1.13
425,000	Smiths Group Plc	6,793,625	1.07
200,000	Cranswick Plc	6,156,000	0.97
235,000	Derwent London Plc (REIT)	5,564,800	0.88
1,750,000	Headlam Group Plc	5,285,000	0.83
275,000	Computacenter Plc	5,255,250	0.83
3,000,000	Luceco Plc '144A'	2,946,000	0.47
		<b>579,399,665</b>	<b>91.52</b>
<b>Total equities</b>		<b>619,198,810</b>	<b>97.81</b>
<b>Total financial assets at fair value through profit or loss</b>		<b>619,198,810</b>	<b>97.81</b>
Cash and cash equivalents		12,898,626	2.04
Other net assets		984,115	0.15
<b>Total net assets attributable to holders of redeemable participating Shares</b>		<b>633,081,551</b>	<b>100.00</b>
<b>Analysis of Total Assets</b>			<b>% of Total Assets</b>
Financial assets at fair value through profit or loss			97.62
Cash and cash equivalents			2.03
Other assets			0.35
<b>Total assets</b>			<b>100.00</b>

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS MONTANARO EUROPEAN INCOME FUND

As at 31 December 2022

Shares	Description	Fair value €	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Austria - Nil (31 December 2021: 0.79%)</b>			
<b>Belgium (31 December 2021: 5.30%)</b>			
82,000	Melexis NV	6,683,000	2.32
184,500	Warehouses De Pauw CVA (REIT)	4,937,220	1.71
		<b>11,620,220</b>	<b>4.03</b>
<b>Denmark (31 December 2021: 4.72%)</b>			
325,000	Tryg A/S	7,226,405	2.50
90,000	Chr Hansen Holding A/S	6,047,650	2.10
		<b>13,274,055</b>	<b>4.60</b>
<b>France (31 December 2021: 12.72%)</b>			
190,000	Amundi SA '144A'	10,098,500	3.50
170,000	Edenred	8,687,000	3.02
350,000	Bureau Veritas SA	8,645,000	3.00
84,000	Gaztransport Et Technigaz SA	8,416,800	2.92
222,000	Kaufman & Broad SA	6,138,300	2.13
68,000	Thermador Groupe	5,854,800	2.03
		<b>47,840,400</b>	<b>16.60</b>
<b>Germany (31 December 2021: 11.48%)</b>			
45,000	MTU Aero Engines AG	9,099,000	3.16
145,000	Brenntag SE	8,659,400	3.00
64,000	Amadeus Fire AG	7,398,400	2.57
113,500	Mensch und Maschine Software SE	5,175,600	1.80
6,000	Rational AG	3,330,000	1.15
		<b>33,662,400</b>	<b>11.68</b>
<b>Italy (31 December 2021: 7.45%)</b>			
225,000	Recordati Industria Chimica e Farmaceutica SpA	8,750,250	3.04
160,000	Moncler SpA	7,937,600	2.75
1,100,000	Terna - Rete Elettrica Nazionale	7,640,600	2.65
180,000	Cembre SpA	5,436,000	1.89
450,000	MARR SpA	5,139,000	1.78
1,000,000	Enav SpA '144A'	3,964,000	1.38
350,000	Brembo SpA	3,671,500	1.27
250,000	Zignago Vetro SpA	3,540,000	1.23
125,000	Carel Industries SpA '144A'	2,943,750	1.02
		<b>49,022,700</b>	<b>17.01</b>
<b>Netherlands (31 December 2021: 1.46%)</b>			
75,000	Euronext NV '144A'	5,215,500	1.81
		<b>5,215,500</b>	<b>1.81</b>
<b>Norway (31 December 2021: 12.16%)</b>			
3,757,000	Kitron ASA	10,023,683	3.48
675,000	Atea ASA	7,319,170	2.54
1,250,000	Bouvet ASA	7,133,694	2.47
340,000	Borregaard ASA	4,915,591	1.71
535,031	Kid ASA '144A'	3,684,434	1.28
1,942,516	Elmera Group ASA '144A'	2,954,380	1.02
		<b>36,030,952</b>	<b>12.50</b>



**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO EUROPEAN INCOME FUND (continued)**

*As at 31 December 2022*

<b>Shares</b>	<b>Description</b>	<b>Fair value €</b>	<b>% of net assets</b>
<b>Portugal (31 December 2021: 1.70%)</b>			
626,000	Corticeira Amorim SGPS SA	5,496,280	1.91
		<b>5,496,280</b>	<b>1.91</b>
<b>Spain (31 December 2021: 5.28%)</b>			
133,500	Viscofan SA	8,070,075	2.80
730,000	Merlin Properties Socimi SA (REIT)	6,427,650	2.23
		<b>14,497,725</b>	<b>5.03</b>
<b>Sweden (31 December 2021: 28.91%)</b>			
400,000	Loomis AB - Class B	10,345,121	3.59
1,150,000	NCAB Group AB	6,773,698	2.35
300,000	KNOW IT AB	5,525,071	1.92
500,000	Bravida Holding AB '144A'	5,022,383	1.74
330,000	Beijer Alma AB	4,849,005	1.68
220,000	Thule Group AB '144A'	4,322,757	1.50
185,000	Avanza Bank Holding AB	3,743,182	1.30
350,000	BioGaia AB - Class B	2,661,459	0.92
15,000,000	Bredband2 i Skandinavien AB	1,829,101	0.63
		<b>45,071,777</b>	<b>15.63</b>
<b>Switzerland (31 December 2021: 6.46%)</b>			
15,000	Burckhardt Compression Holding AG	8,400,678	2.92
100,000	Galenica AG '144A'	7,671,505	2.66
5,000	Partners Group Holding AG	4,153,247	1.44
		<b>20,225,430</b>	<b>7.02</b>
<b>Total equities</b>		<b>281,957,439</b>	<b>97.82</b>
<b>Total financial assets at fair value through profit or loss</b>		<b>281,957,439</b>	<b>97.82</b>
Cash and cash equivalents		6,152,571	2.13
Other net assets		139,907	0.05
<b>Total net assets attributable to holders of redeemable participating Shares</b>		<b>288,249,917</b>	<b>100.00</b>
<b>Analysis of Total Assets</b>			<b>% of Total Assets</b>
Financial assets at fair value through profit or loss			97.56
Cash and cash equivalents			2.13
Other assets			0.31
<b>Total assets</b>			<b>100.00</b>

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**  
**MONTANARO EUROPEAN MIDCAP FUND**

*As at 31 December 2022*

Shares	Description	Fair value €	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Belgium (31 December 2021: 6.56%)</b>			
155,000	Warehouses De Pauw CVA (REIT)	4,147,800	4.08
35,000	Melexis NV	2,852,500	2.80
		<b>7,000,300</b>	<b>6.88</b>
<b>Denmark (31 December 2021: 2.52%)</b>			
50,000	Chr Hansen Holding A/S	3,359,805	3.30
		<b>3,359,805</b>	<b>3.30</b>
<b>France (31 December 2021: 16.56%)</b>			
110,000	Edenred	5,621,000	5.52
125,000	Worldline SA/France '144A'	4,575,000	4.49
80,000	Amundi SA '144A'	4,252,000	4.18
18,500	Teleperformance	4,147,700	4.07
9,000	Sartorius Stedim Biotech	2,735,100	2.69
100,000	Bureau Veritas SA	2,470,000	2.43
		<b>23,800,800</b>	<b>23.38</b>
<b>Germany (31 December 2021: 3.42%)</b>			
22,000	MTU Aero Engines AG	4,448,400	4.37
		<b>4,448,400</b>	<b>4.37</b>
<b>Iceland - Nil (31 December 2021: 3.46%)</b>			
<b>Italy (31 December 2021: 12.91%)</b>			
105,000	Moncler SpA	5,209,050	5.12
110,000	Recordati Industria Chimica e Farmaceutica SpA	4,277,900	4.20
39,000	Reply SpA	4,219,800	4.14
360,000	Terna - Rete Elettrica Nazionale	2,500,560	2.46
		<b>16,207,310</b>	<b>15.92</b>
<b>Netherlands (31 December 2021: 8.16%)</b>			
32,000	IMCD NV	4,292,800	4.21
12,500	ASM International NV	2,961,875	2.91
		<b>7,254,675</b>	<b>7.12</b>
<b>Sweden - Nil (31 December 2021: 2.61%)</b>			
<b>Switzerland (31 December 2021: 11.23%)</b>			
9,400	Tecan Group AG	3,941,179	3.87
50,000	Galenica AG '144A'	3,835,752	3.77
25,000	Bachem Holding AG	2,030,544	1.99
		<b>9,807,475</b>	<b>9.63</b>
<b>United Kingdom (31 December 2021: 33.89%)</b>			
930,000	Rentokil Initial Plc	5,324,881	5.23
155,000	Diploma Plc	4,849,695	4.77
90,000	Ashtead Group Plc	4,787,930	4.70
461,103	RS GROUP Plc	4,654,004	4.57
350,000	St James's Place Plc	4,319,619	4.24

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO EUROPEAN MIDCAP FUND (continued)**

*As at 31 December 2022*

<b>Shares</b>	<b>Description</b>	<b>Fair value €</b>	<b>% of net assets</b>
<b>United Kingdom (31 December 2021: 33.89%) (continued)</b>			
85,000	Dechra Pharmaceuticals Plc	2,508,140	2.47
		<b>26,444,269</b>	<b>25.98</b>
<b>Total equities</b>		<b>98,323,034</b>	<b>96.58</b>
<b>Total financial assets at fair value through profit or loss</b>		<b>98,323,034</b>	<b>96.58</b>
Cash and cash equivalents		3,712,866	3.65
Other net liabilities		(234,423)	(0.23)
<b>Total net assets attributable to holders of redeemable participating Shares</b>		<b>101,801,477</b>	<b>100.00</b>
			<b>% of Total Assets</b>
<b>Analysis of Total Assets</b>			
Financial assets at fair value through profit or loss			96.19
Cash and cash equivalents			3.63
Other assets			0.18
<b>Total assets</b>			<b>100.00</b>

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS  
MONTANARO GLOBAL INNOVATION FUND**

*As at 31 December 2022*

Shares	Description	Fair value €	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Australia (31 December 2021: 3.50%)</b>			
31,500	Technology One Ltd	263,006	2.37
7,200	Pro Medicus Ltd	252,815	2.28
		<b>515,821</b>	<b>4.65</b>
<b>Denmark (31 December 2021: 1.36%)</b>			
2,650	Chemometec A/S	246,062	2.22
		<b>246,062</b>	<b>2.22</b>
<b>Finland - Nil (31 December 2021: 2.23%)</b>			
<b>France (31 December 2021: 5.17%)</b>			
1,200	Sartorius Stedim Biotech	364,680	3.29
1,450	Esker SA	230,405	2.08
		<b>595,085</b>	<b>5.37</b>
<b>Germany (31 December 2021: 2.26%)</b>			
600	MTU Aero Engines AG	121,320	1.09
10,250	hGears AG	74,210	0.67
		<b>195,530</b>	<b>1.76</b>
<b>Israel (31 December 2021: 4.56%)</b>			
2,225	Nova Ltd	169,890	1.53
10,000	Maytronics Ltd	92,942	0.84
2,400	Kornit Digital Ltd	49,608	0.45
		<b>312,440</b>	<b>2.82</b>
<b>Italy (31 December 2021: 2.00%)</b>			
1,600	Reply SpA	173,120	1.56
7,500	Intred SpA	105,375	0.95
		<b>278,495</b>	<b>2.51</b>
<b>Netherlands (31 December 2021: 2.88%)</b>			
225	Adyen NV '144A'	292,500	2.64
		<b>292,500</b>	<b>2.64</b>
<b>Norway (31 December 2021: 2.42%)</b>			
15,000	PhotoCure ASA	152,376	1.37
4,500	Medistim ASA	98,873	0.89
		<b>251,249</b>	<b>2.26</b>
<b>Sweden (31 December 2021: 10.99%)</b>			
62,500	Fortnox AB	267,812	2.41
35,000	NCAB Group AB	206,156	1.86
11,750	INVISIO AB	174,767	1.58
4,125	MIPS AB	159,173	1.44
10,000	Surgical Science Sweden AB	149,817	1.35
6,500	Plejd AB	121,463	1.09
		<b>1,079,188</b>	<b>9.73</b>

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS

### MONTANARO GLOBAL INNOVATION FUND (continued)

As at 31 December 2022

#### Switzerland (31 December 2021: 1.31%)

750	Tecan Group AG	314,456	2.84
1,850	Bachem Holding AG	150,260	1.35
		<b>464,716</b>	<b>4.19</b>

#### United Kingdom (31 December 2021: 7.24%)

16,500	Kainos Group Plc	286,954	2.59
65,000	Oxford Nanopore Technologies Plc	180,590	1.63
12,000	Focusrite Plc	112,259	1.01
65,000	SDI Group Plc	110,625	1.00
37,500	Advanced Medical Solutions Group Plc	109,470	0.99
9,250	Frontier Developments Plc	100,191	0.90
6,750	Cerillion Plc	92,056	0.83
		<b>992,145</b>	<b>8.95</b>

#### United States (31 December 2021: 50.59%)

10,000	TransMedics Group Inc	562,192	5.07
6,250	XPEL Inc	356,582	3.22
1,550	ANSYS Inc	348,305	3.14
5,150	Bruker Corp	328,664	2.96
1,100	Paycom Software Inc	318,709	2.87
1,000	Tyler Technologies Inc	302,235	2.73
1,150	SolarEdge Technologies Inc	298,111	2.69
170,000	Boku Inc '144A'	267,292	2.41
2,550	SiTime Corp	238,669	2.15
3,000	Bio-Techne Corp	231,370	2.09
5,000	Cognex Corp	220,098	1.98
1,075	Shockwave Medical Inc	205,934	1.86
1,350	Veeva Systems Inc - Class A	203,275	1.83
10,000	Energy Recovery Inc	191,239	1.72
5,750	Inmode Ltd	190,508	1.72
1,150	Axon Enterprise Inc	177,675	1.60
5,000	Bentley Systems Inc - Class B	173,155	1.56
1,600	Zscaler Inc	167,113	1.51
2,200	Ambarella Inc	166,868	1.50
1,150	Masimo Corp	157,482	1.42
29,000	MaxCyte Inc	143,001	1.29
3,150	TechTarget Inc	129,424	1.17
5,500	FormFactor Inc	115,076	1.04
4,250	Unity Software Inc	112,537	1.01
6,000	Digital Turbine Inc	84,610	0.76
825	Power Integrations Inc	55,286	0.50
		<b>5,745,410</b>	<b>51.80</b>

**Total equities** **10,968,641** **98.90**

**Total financial assets at fair value through profit or loss** **10,968,641** **98.90**

Cash and cash equivalents	136,502	1.23
Other net liabilities	(14,183)	(0.13)

**Total net assets attributable to holders of redeemable participating Shares** **11,090,960** **100.00**

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO GLOBAL INNOVATION FUND (continued)**

*As at 31 December 2022*

	<b>% of Total</b>
<b>Analysis of Total Assets</b>	<b>Assets</b>
Financial assets at fair value through profit or loss	98.73
Cash and cash equivalents	1.23
Other assets	0.04
<b>Total assets</b>	<b>100.00</b>

# MONTANARO SMALLER COMPANIES PLC

## SCHEDULE OF INVESTMENTS MONTANARO BETTER WORLD FUND

*As at 31 December 2022*

Shares	Description	Fair value €	% of net assets
<b>Transferable securities admitted to a stock exchange listing or dealt in on another regulated market</b>			
<b>Australia (31 December 2021: 4.85%)</b>			
500,000	Pro Medicus Ltd	17,556,598	2.89
900,000	IDP Education Ltd	15,543,594	2.55
		<b>33,100,192</b>	<b>5.44</b>
<b>Belgium (31 December 2021: 2.11%)</b>			
160,000	Melexis NV	13,040,000	2.14
		<b>13,040,000</b>	<b>2.14</b>
<b>Denmark (31 December 2021: 2.11%)</b>			
275,000	Chr Hansen Holding A/S	18,478,930	3.04
117,500	Chemometec A/S	10,910,291	1.79
		<b>29,389,221</b>	<b>4.83</b>
<b>France (31 December 2021: 3.16%)</b>			
52,500	Sartorius Stedim Biotech	15,954,750	2.62
		<b>15,954,750</b>	<b>2.62</b>
<b>Germany (31 December 2021: 3.95%)</b>			
15,000	Rational AG	8,325,000	1.37
		<b>8,325,000</b>	<b>1.37</b>
<b>Greece (31 December 2021: Nil%)</b>			
850,000	Terna Energy SA	17,323,000	2.85
		<b>17,323,000</b>	<b>2.85</b>
<b>Ireland - Nil (31 December 2021: 3.43%)</b>			
<b>Israel (31 December 2021: 3.31%)</b>			
200,000	Nova Ltd	15,271,014	2.51
		<b>15,271,014</b>	<b>2.51</b>
<b>Japan (31 December 2021: 4.39%)</b>			
400,000	Yaskawa Electric Corp	12,001,273	1.97
200,000	Shionogi & Co Ltd	9,353,891	1.54
300,000	Azbil Corp	7,083,592	1.16
301,000	Mani Inc	4,339,135	0.71
350,000	Nihon M&A Center Holdings Inc	4,048,832	0.67
		<b>36,826,723</b>	<b>6.05</b>
<b>Netherlands (31 December 2021: 3.08%)</b>			
9,000	Adyen NV '144A'	11,700,000	1.93
100,000	Alfen Beheer BV '144A'	8,408,000	1.38
		<b>20,108,000</b>	<b>3.31</b>
<b>New Zealand (31 December 2021: 1.30%)</b>			
2,250,000	Ryman Healthcare Ltd	7,120,061	1.17
		<b>7,120,061</b>	<b>1.17</b>
<b>Sweden (31 December 2021: 7.98%)</b>			
500,000	Thule Group AB '144A'	9,824,447	1.61
450,000	Sdiptech AB - Class B	9,185,971	1.51
600,000	Surgical Science Sweden AB	8,989,032	1.48

**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO BETTER WORLD FUND (continued)**

*As at 31 December 2022*

Shares	Description	Fair value €	% of net assets
<b>Sweden (31 December 2021: 7.98%) (continued)</b>			
225,000	MIPS AB	8,682,159	1.43
		<b>36,681,609</b>	<b>6.03</b>
<b>Switzerland (31 December 2021: 6.89%)</b>			
40,000	Tecan Group AG	16,770,973	2.76
25,000	Belimo Holding AG	11,266,732	1.85
		<b>28,037,705</b>	<b>4.61</b>
<b>United Kingdom (31 December 2021: 6.43%)</b>			
125,000	Spirax-Sarco Engineering Plc	14,955,236	2.46
600,000	Halma Plc	13,349,397	2.19
1,500,000	Marshalls Plc	4,618,864	0.76
1,000,000	Tristel Plc	4,395,698	0.72
		<b>37,319,195</b>	<b>6.13</b>
<b>United States (31 December 2021: 44.31%)</b>			
90,000	ANSYS Inc	20,224,162	3.32
310,000	Bruker Corp	19,783,637	3.25
85,000	IDEX Corp	18,190,666	2.99
90,000	ICON Plc	16,242,576	2.67
210,000	Bio-Techne Corp	16,195,914	2.66
400,000	Trex Co Inc	15,861,316	2.61
35,000	MSCI Inc - Class A	15,186,826	2.50
100,000	Veeva Systems Inc - Class A	15,057,381	2.47
100,000	American Water Works Co Inc	14,397,742	2.37
225,000	Entegris Inc	13,789,872	2.27
125,000	Xylem Inc/NY	12,914,023	2.12
32,500	IDEXX Laboratories Inc	12,367,807	2.03
275,000	Cognex Corp	12,105,404	1.99
45,000	SolarEdge Technologies Inc	11,665,207	1.92
85,000	Masimo Corp	11,639,955	1.91
100,000	Balchem Corp	11,491,209	1.89
95,000	Zscaler Inc	9,922,364	1.63
500,000	Energy Recovery Inc	9,561,952	1.57
200,000	Alarm.com Holdings Inc	9,201,212	1.51
85,000	Badger Meter Inc	8,728,175	1.43
150,000	Ameresco Inc - Class A	7,957,831	1.31
100,000	Advanced Drainage Systems Inc	7,691,726	1.26
25,000	Tyler Technologies Inc	7,555,863	1.24
55,000	Power Integrations Inc	3,685,732	0.61
		<b>301,418,552</b>	<b>49.53</b>
<b>Total equities</b>		<b>599,915,022</b>	<b>98.59</b>
<b>Total financial assets at fair value through profit or loss</b>		<b>599,915,022</b>	<b>98.59</b>
Cash and cash equivalents		9,117,092	1.50
Other net liabilities		(517,811)	(0.09)
<b>Total net assets attributable to holders of redeemable participating Shares</b>		<b>608,514,303</b>	<b>100.00</b>



**MONTANARO SMALLER COMPANIES PLC**

**SCHEDULE OF INVESTMENTS**

**MONTANARO BETTER WORLD FUND (continued)**

*As at 31 December 2022*

	<b>% of Total</b>
<b>Analysis of Total Assets</b>	<b>Assets</b>
Financial assets at fair value through profit or loss	98.32
Cash and cash equivalents	1.49
Other assets	0.19
<b>Total assets</b>	<b>100.00</b>

**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN SMALLER COMPANIES FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost €</b>
Chr Hansen Holding A/S	135,000	9,404,129
Bachem Holding AG	110,000	7,289,576
Technoprobe SpA	800,000	5,486,562
Clarkson Plc	125,000	5,093,182
MTU Aero Engines AG	25,000	4,882,204
Plejd AB	150,000	4,772,071
Kainos Group Plc	300,000	4,241,565
Spirax-Sarco Engineering Plc	30,000	3,964,416
RS GROUP Plc	350,000	3,907,559
CTS Eventim AG & Co KGaA	50,000	3,180,388
QT Group Oyj	20,000	2,134,587
Orpea SA	50,000	1,858,027
Games Workshop Group Plc	20,000	1,781,373
Melexis NV	20,000	1,509,632
Merlin Properties Socimi SA (REIT)	150,000	1,504,321
Marshalls Plc	400,000	1,471,947
Halma Plc	60,000	1,398,256
Cranswick Plc	30,000	1,352,306
Marel HF '144A'	400,000	1,341,438
SimCorp A/S	15,000	1,202,766
Esker SA	9,000	1,124,627
Reply SpA	10,000	1,065,437
XP Power Ltd	35,000	905,630
Advanced Medical Solutions Group Plc	250,000	843,331
Diploma Plc	25,000	830,594

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales. Due to trading volumes, the above details all purchases transactions during the financial year.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN SMALLER COMPANIES FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds €</b>
Ideagen Plc	2,622,000	10,757,236
Recordati Industria Chimica e Farmaceutica SpA	200,000	9,310,657
Bakkafrost P/F	145,000	8,613,057
Nolato AB	1,000,000	7,558,580
Big Yellow Group Plc (REIT)	380,000	5,556,069
Vitrolife AB	280,000	5,137,453
INVISIO AB	300,000	5,099,076
QT Group Oyj	100,000	3,930,729
SimCorp A/S	65,000	3,720,161
Sartorius Stedim Biotech	10,000	3,697,002
Orpea SA	125,000	3,115,202
Shaftesbury Plc (REIT)	350,000	2,108,670
Dechra Pharmaceuticals Plc	50,000	1,852,415
Merlin Properties Socimi SA (REIT)	150,000	1,582,240
CTS Eventim AG & Co KGaA	30,000	1,563,819
Elmera Group ASA '144A'	675,750	1,474,825
Belimo Holding AG	3,000	1,299,592
Fortnox AB	250,000	1,246,912
James Fisher & Sons Plc	290,000	1,009,893
Thule Group AB '144A'	25,000	785,674

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO UK INCOME FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost £</b>
Sage Group Plc/The	2,000,000	16,180,942
RS GROUP Plc	1,350,000	13,344,733
Intertek Group Plc	250,000	11,582,944
Games Workshop Group Plc	149,847	10,432,612
Spirent Communications Plc	4,000,000	10,246,301
Liontrust Asset Management Plc	600,000	7,730,577
Tritax Big Box REIT Plc (REIT)	3,000,000	7,266,320
Computacenter Plc	275,000	7,060,015
Smiths Group Plc	425,000	6,664,169
Greggs Plc	250,000	5,412,839
St James's Place Plc	350,000	4,542,282
Marshalls Plc	1,275,000	4,484,318
Luceco Plc '144A'	1,250,000	2,825,571
Kainos Group Plc	250,000	2,738,176
Diploma Plc	75,000	1,975,866
Admiral Group Plc	75,000	1,948,184
Clarkson Plc	50,000	1,909,142
Pennon Group Plc	175,000	1,863,166
Vistry Group Plc	175,000	1,700,595
XP Power Ltd	75,000	1,654,737
Brewin Dolphin Holdings Plc	450,000	1,430,099
United Utilities Group Plc	150,000	1,406,922
Hilton Food Group Plc	225,000	1,329,429

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO UK INCOME FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds £</b>
Brewin Dolphin Holdings Plc	7,250,000	37,426,915
Biffa Plc '144A'	2,750,000	10,032,725
LondonMetric Property Plc (REIT)	3,000,000	7,785,489
Atea ASA	800,000	7,251,624
TI Fluid Systems Plc '144A'	4,500,000	6,977,218
4imprint Group Plc	167,500	6,049,470
Rathbones Group Plc	275,000	4,918,644
Galenica AG '144A'	66,226	3,579,277
Reach Plc	3,500,000	3,281,456
Severn Trent Plc	100,000	3,002,218
Savills Plc	275,000	2,606,661
Vistry Group Plc	275,000	2,568,038
James Fisher & Sons Plc	760,000	2,256,713
Kainos Group Plc	175,000	2,191,755
Big Yellow Group Plc (REIT)	150,000	2,126,649
Tritax Big Box REIT Plc (REIT)	1,000,000	1,805,248
Primary Health Properties Plc (REIT)	1,000,000	1,479,279
Taylor Wimpey Plc	1,000,000	1,165,051
NCC Group Plc	500,000	1,126,856
Bloomsbury Publishing Plc	275,000	1,092,033

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN INCOME FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost €</b>
Brenntag SE	145,000	9,709,329
Bouvet ASA	1,250,000	8,002,113
Terna - Rete Elettrica Nazionale	1,100,000	7,981,106
Moncler SpA	160,000	6,470,819
Amundi SA '144A'	95,000	5,723,806
Loomis AB - Class B	150,000	3,551,872
MARR SpA	200,000	3,060,133
Zignago Vetro SpA	250,000	2,993,760
Carel Industries SpA '144A'	125,000	2,976,965
BioGaia AB - Class B	350,000	2,704,504
KNOW IT AB	100,000	2,038,714
SimCorp A/S	25,000	2,014,404
Chr Hansen Holding A/S	30,000	1,949,808
Melexis NV	21,500	1,883,109
Edenred	50,000	1,861,342
MTU Aero Engines AG	10,000	1,752,336
Fielmann AG	33,500	1,644,188
Recordati Industria Chimica e Farmaceutica SpA	42,500	1,500,923
Kid ASA '144A'	135,031	1,438,233
Cembre SpA	49,762	1,352,743
Elmera Group ASA '144A'	754,516	1,212,933

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN INCOME FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds €</b>
NCAB Group AB	1,350,000	7,896,802
Nolato AB	1,500,000	7,469,144
Galenica AG '144A'	100,000	7,383,701
Red Electrica Corp SA	350,000	6,449,315
Avanza Bank Holding AB	315,000	5,587,022
KNOW IT AB	210,000	5,539,617
SimCorp A/S	85,000	5,368,092
Edenred	110,000	5,255,079
Shurgard Self Storage SA	100,000	4,364,048
CTS Eventim AG & Co KGaA	80,000	4,000,529
Thermador Groupe	42,000	3,585,034
Bakkafrost P/F	65,000	3,511,806
Hufvudstaden AB	315,000	3,481,523
Medistim ASA	170,000	3,429,317
Thule Group AB '144A'	150,000	3,303,299
FUCHS PETROLUB SE - Preference	125,000	3,161,470
Fielmann AG	105,000	3,067,454
Biotage AB	200,000	3,014,497
Atea ASA	175,000	2,467,242
Brembo SpA	245,000	2,145,379
Melexis NV	20,000	1,477,705
Chr Hansen Holding A/S	20,000	1,425,733
Fabasoft AG	92,500	1,422,326
Tryg A/S	55,000	1,215,117

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN MIDCAP FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost €</b>
Amundi SA '144A'	105,000	6,181,087
RS GROUP Plc	461,103	5,680,282
MTU Aero Engines AG	22,000	4,136,473
Thule Group AB '144A'	125,000	3,961,166
Galenica AG '144A'	50,000	3,416,619
Chr Hansen Holding A/S	50,000	2,766,525
Bachem Holding AG	40,000	2,549,180
Bureau Veritas SA	100,000	2,548,820
Terna - Rete Elettrica Nazionale	360,000	2,445,964
Sartorius Stedim Biotech	4,000	1,255,962
Tecan Group AG	4,000	1,176,750
Temenos AG	15,000	1,135,267
Rentokil Initial Plc	180,000	1,073,139
Reply SpA	9,000	1,039,935
SimCorp A/S	10,000	933,581
Moncler SpA	15,000	676,234
Worldline SA/France '144A'	15,000	651,876
ASM International NV	2,000	578,490

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales. Due to trading volumes, the above details all purchases transactions during the financial year.*



**MONTANARO SMALLER COMPANIES PLC****MONTANARO EUROPEAN MIDCAP FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds €</b>
Auto Trader Group PLC '144A'	950,000	7,225,699
Rightmove Plc	800,000	5,156,892
Marel HF	1,000,000	5,007,432
Symrise AG - Class A	45,000	4,415,688
Temenos AG	70,000	4,402,209
Straumann Holding AG	3,000	3,858,032
SimCorp A/S	55,000	3,449,744
Tecan Group AG	7,600	2,834,455
Sinch AB '144A'	400,000	2,727,970
Thule Group AB '144A'	125,000	2,688,283
Edenred	55,000	2,622,024
Sartorius Stedim Biotech	6,000	2,265,335
Moncler SpA	40,000	2,170,358
Rentokil Initial Plc	350,000	2,168,449
Dechra Pharmaceuticals Plc	45,000	2,123,347
Teleperformance	6,500	2,058,594
Recordati Industria Chimica e Farmaceutica SpA	40,000	1,939,332
Ashtead Group Plc	35,000	1,914,676
St James's Place Plc	100,000	1,698,852
Diploma Plc	55,000	1,623,492
ASM International NV	5,500	1,405,013
Bachem Holding AG	15,000	1,316,948
Amundi SA '144A'	25,000	1,305,273
IMCD NV	8,000	1,178,253
Worldline SA/France '144A'	25,000	1,169,101
Melexis NV	10,000	738,853

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO GLOBAL INNOVATION FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost €</b>
Shockwave Medical Inc	1,075	201,101
Bentley Systems Inc - Class B	5,000	183,593
FormFactor Inc	5,500	178,967
Adyen NV '144A'	95	155,925
Tecan Group AG	475	151,113
Focusrite Plc	12,000	147,116
Bachem Holding AG	1,850	126,532
SDI Group Plc	65,000	124,314
MTU Aero Engines AG	600	115,868
Tyler Technologies Inc	275	101,358
Cerillion Plc	6,750	95,254
Kainos Group Plc	6,500	93,203
Kornit Digital Ltd	1,150	92,917
Inmode Ltd	2,500	86,766
Nova Ltd	850	70,083
INVISIO AB	5,068	66,686
Sartorius Stedim Biotech	200	62,798
Power Integrations Inc	825	56,392
Reply SpA	450	55,918
Veeva Systems Inc - Class A	300	55,063
Avalara Inc	550	53,897
SolarEdge Technologies Inc	250	53,421
Oxford Nanopore Technologies Plc	12,500	52,121
Chemometec A/S	550	50,968
MIPS AB	1,125	48,779
ANSYS Inc	200	48,579
Masimo Corp	350	48,161
Paycom Software Inc	150	44,794
Esker SA	300	42,861
Bruker Corp	650	41,200
QT Group Oyj	400	41,194
Ambarella Inc	550	38,357
Unity Software Inc	400	37,886
SiTime Corp	375	36,251
Plejd AB	1,500	35,936
TechTarget Inc	550	35,846
XPEL Inc	650	34,122
Boku Inc '144A'	25,000	30,519

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO GLOBAL INNOVATION FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds €</b>
Ideagen Plc	75,000	306,590
Entegris Inc	3,600	278,102
Avalara Inc	3,000	274,781
Alarm.com Holdings Inc	4,250	255,000
Nova Ltd	1,875	168,578
Alfen Beheer BV '144A'	2,250	161,930
Everbridge Inc	3,550	154,071
QT Group Oyj	3,300	129,714
SiTime Corp	700	128,238
SolarEdge Technologies Inc	450	127,763
Fortnox AB	24,000	122,239
TechTarget Inc	1,750	113,350
EcoOnline Holding AS	50,000	112,940
Sinch AB '144A'	15,000	102,299
Endor AG	8,000	95,661
Novocure Ltd	1,400	88,932
Axon Enterprise Inc	400	72,589
Technology One Ltd	8,500	64,372
Tecan Group AG	150	62,369
Masimo Corp	250	34,888
INVISIO AB	1,818	33,669
Pro Medicus Ltd	800	31,235

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO BETTER WORLD FUND****PORTFOLIO CHANGES – PURCHASES (unaudited)***For the financial year ended 31 December 2022*

<b>Purchases</b>	<b>Nominal</b>	<b>Cost €</b>
American Water Works Co Inc	125,000	17,929,999
Terna Energy SA	1,000,000	16,566,265
MSCI Inc - Class A	37,500	15,896,880
Catalent Inc	150,000	14,675,049
Balchem Corp	100,000	12,724,216
Tyler Technologies Inc	30,000	11,342,980
Chr Hansen Holding A/S	175,000	10,971,658
Trex Co Inc	185,000	10,891,487
Marshalls Plc	1,500,000	10,620,324
Azbil Corp	300,000	8,474,031
Veeva Systems Inc - Class A	42,500	7,629,001
ANSYS Inc	25,000	7,150,689
Spirax-Sarco Engineering Plc	50,000	6,654,586
Ameresco Inc - Class A	100,000	6,269,403
Sartorius Stedim Biotech	17,500	6,070,285
Entegris Inc	50,000	5,846,309
Tecan Group AG	17,500	5,702,146
Alarm.com Holdings Inc	75,000	5,305,800
Sdiptech AB - Class B	200,000	5,182,828
Adyen NV '144A'	3,000	5,064,308
Ryman Healthcare Ltd	750,000	4,357,853
Nihon M&A Center Holdings Inc	350,000	4,308,633
Halma Plc	125,000	3,954,860
Cognex Corp	65,000	3,948,640
Mani Inc	301,000	3,933,958
Masimo Corp	25,000	3,923,990
IDEXX Laboratories Inc	7,500	3,912,628
Advanced Drainage Systems Inc	35,000	3,891,011
Power Integrations Inc	55,000	3,759,483
MIPS AB	65,000	3,747,954
Bio-Techne Corp	10,000	3,663,154
Thule Group AB '144A'	100,000	3,324,014

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

**MONTANARO SMALLER COMPANIES PLC****MONTANARO BETTER WORLD FUND****PORTFOLIO CHANGES – SALES (unaudited)***For the financial year ended 31 December 2022*

<b>Sales</b>	<b>Nominal</b>	<b>Proceeds €</b>
Dexcom Inc	127,500	20,879,893
SolarEdge Technologies Inc	60,000	17,222,380
Carl Zeiss Meditec AG	115,000	14,387,733
Straumann Holding AG	117,500	12,875,141
Sartorius Stedim Biotech	30,000	11,097,095
IDEX Corp	50,000	10,624,959
Tecan Group AG	27,500	10,502,934
Xylem Inc/NY	100,000	9,798,756
ICON Plc	45,000	9,661,793
Spirax-Sarco Engineering Plc	75,000	9,639,958
Advanced Drainage Systems Inc	75,000	8,926,707
Middlesex Water Co	107,500	8,859,563
Bio-Techne Corp	25,000	8,705,250
IDEXX Laboratories Inc	20,000	7,958,142
Nova Ltd	85,000	7,905,734
Bruker Corp	105,000	6,760,571
Pro Medicus Ltd	205,000	6,721,924
Catalent Inc	150,000	6,361,117
Belimo Holding AG	14,500	6,158,078
Cognex Corp	140,000	6,148,672
Melexis NV	72,806	5,956,775
Alfen Beheer BV '144A'	60,000	5,953,306
Santen Pharmaceutical Co Ltd	600,000	5,886,395
RENOVA Inc	500,000	5,847,199
Entegris Inc	50,000	5,741,541
Genuit Group PLC	1,500,000	5,534,292
Trex Co Inc	100,000	5,071,092
Veeva Systems Inc - Class A	22,500	4,908,859
Badger Meter Inc	45,000	4,679,930
Rational AG	8,500	4,206,618
Simulations Plus Inc	100,000	3,908,196
American Water Works Co Inc	25,000	3,613,953
IDP Education Ltd	200,000	3,387,616
Biotage AB	200,000	3,387,400

*In accordance with Central Bank UCITS Regulations, this statement presents the aggregate purchases and aggregate sales of an investment exceeding 1% of total value of purchases or sales, respectively, for the financial year, or at a minimum the top 20 purchases and sales.*

## MONTANARO SMALLER COMPANIES PLC

### TOTAL EXPENSE RATIOS (ANNUALISED) (unaudited)

*For the financial year ended 31 December 2022*

The average total expense ratio table shows the annualised actual expenses incurred by each Fund during the financial reporting year, expressed as a percentage of the average NAV of that Fund for the corresponding financial year.

	Total expense ratio %
<b>Montanaro European Smaller Companies Fund</b>	
Euro Accumulation Class	1.59
Euro Class	1.59
Euro Institutional Accumulation Class	0.59
Euro Institutional Distribution Class	0.84
Sterling Class	1.59
Sterling Institutional Distribution Class	0.84
Swedish Krona Accumulation Class	1.59
US Dollar Class	1.59
<b>Montanaro UK Income Fund</b>	
Euro Class	0.84
Euro Seed Class	0.39
Sterling Accumulation Class	0.84
Sterling Class	0.84
Sterling Seed Class	0.39
<b>Montanaro European Income Fund</b>	
Euro Class	0.85
Sterling Accumulation Class	0.85
Sterling Class	0.85
<b>Montanaro European MidCap Fund</b>	
Euro Distribution Class	1.58
Euro Institutional Accumulation Class	0.83
<b>Montanaro Global Innovation Fund*</b>	
Euro Accumulation A Class	0.78
Euro Accumulation B Class	0.81
Sterling Accumulation A Class	0.79
Sterling Accumulation B Class	0.81
<b>Montanaro Better World Fund</b>	
Euro Accumulation Class	0.95
Euro Distribution Class	0.95
Sterling Distribution Class	0.95
Swedish Krona Institutional Accumulation Class	0.60

\* Effective 1 January 2022, the names of the share classes of Montanaro Global Innovation Fund changed, details of which are provided in Note 16.

## MONTANARO SMALLER COMPANIES PLC

### PORTFOLIO TURNOVER RATES (unaudited)

*For the financial year ended 31 December 2022*

The portfolio turnover rate shows the turnover\* incurred by each Fund, whose redeemable participating Shares are registered for sale in Switzerland during the financial year, expressed as a percentage of the average NAV of that Fund for the corresponding financial year.

	<b>Portfolio Turnover %</b>
Montanaro European Smaller Companies Fund	(11.36%)
Montanaro UK Income Fund	25.87%
Montanaro European Income Fund	12.52%
Montanaro European MidCap Fund	61.44%
Montanaro Global Innovation Fund	14.99%
Montanaro Better World Fund	74.43%

\* Turnover being a Fund's aggregate value of total cost of securities purchased plus total disposal proceeds of securities sold, less the aggregate value of that Fund's redeemable participating Shares' subscriptions plus redemptions, during the financial reporting period. All values in the turnover calculation are in the functional currency of the respective Fund.

Past performance is no indication of current or future performance and the performance data does not take account of commissions and costs incurred on the issue and redemption of Shares.

## MONTANARO SMALLER COMPANIES PLC

### REMUNERATION DISCLOSURE (unaudited)

The Manager has designed and implemented a remuneration policy (the “Policy”) in line with the provisions of S.I. 257 of 2013 European Union (Alternative Investment Fund Managers) Regulations 2013 (“AIFM Regulations”), S.I. 230 of 2019 (Central Bank (Supervision and Enforcement) Act 2013 Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2019 (“UCITS Regulations”) and of the ESMA Guidelines on sound remuneration policies under the UCITS Directive and AIFMD (the “ESMA Guidelines”). The Policy is designed to ensure that the remuneration of key decision makers is aligned with the management of short and long-term risks, including the oversight and where appropriate the management of sustainability risks in line with the Sustainable Finance Disclosures Regulations.

The Manager’s remuneration policy applies to its identified staff whose professional activities might have a material impact on the Company’s risk profile and so covers senior management, risk takers, control functions and any employees receiving total remuneration that takes them into the same remuneration bracket as senior management and risk takers and whose professional activities have a material impact on the risk profile of the Company. The Manager’s policy is to pay identified staff a fixed component with the potential for identified staff to receive a variable component. It is intended that the fixed component will represent a sufficiently high proportion of the total remuneration of the individual to allow the Manager to operate a fully flexible policy, with the possibility of not paying any variable component. When the Manager pays a variable component as performance related pay certain criteria, as set out in the Manager’s remuneration policy, must be adhered to. The various remuneration components are combined to ensure an appropriate and balanced remuneration package that reflects the relevant staff rank and professional activity as well as best market practice. The Manager’s remuneration policy is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profile of the funds it manages.

These disclosures are made in respect of the remuneration policies of the Manager. The disclosures are made in accordance with the ESMA Guidelines.

Total remuneration (in EUR) paid to the identified staff of the Manager fully or partly involved in the activities of the Company that have a material impact on the Company’s risk profile during the financial year to 31 December 2022:

<b>Fixed remuneration</b>		<b>EUR</b>
Senior Management	€	1,387,113
Other identified staff	€	–
<b>Variable remuneration</b>		
Senior Management	€	180,517
Other identified staff	€	–
<b>Total remuneration paid</b>	<b>€</b>	<b>1,567,630</b>

Number of identified staff – 15

Details of Directors' fees are included in Note 3 of the financial statements.

As the Manager delegates investment management functions in respect of the Company, it will, in accordance with the requirements of the ESMA Guidelines, ensure that: a) the entities to which investment management activities have been delegated are subject to regulatory requirements on a remuneration that are equally as effective as those applicable under the ESMA Guidelines; or b) appropriate contractual arrangements are put in place to ensure that the delegates apply in a proportionate manner the remuneration rules as detailed in the UCITS Directive such that there is no circumvention of the remuneration rules set out in the ESMA Guidelines. Details of the remuneration policy of the Manager will be made available free of charge upon request.

The Investment Manager (being the entity to which portfolio management activities are delegated by the Manager) is subject to regulatory requirements on remuneration that are equally as effective as those applicable under the ESMA Guidelines or is subject to appropriate contractual arrangements in order to ensure that there is no circumvention of the remuneration rules set out in the ESMA Guidelines. No remuneration has been paid to staff of the Investment Manager by the Manager or the Company. Instead, the Company pays the investment manager fees to the Investment Manager as disclosed in Note 3 of the financial statements. The Investment Manager pays remuneration to its staff in accordance with the policies, procedures and processes applicable to it.



## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro European Smaller Companies Fund

**Legal entity identifier:** 635400TW8AKLKNTQLF58

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*



**Yes**



**No**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective:** \_\_\_\_%

☒ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 11.7% of sustainable investments

- ☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☒ It promoted E/S characteristics, but **did not make any sustainable investments**



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

The Fund seeks to promote environmental characteristics including:

- the prevention of climate change
- the reduction of greenhouse gas emissions
- the prevention of resource depletion
- the reduction of waste and pollution

The Fund seeks to promote social characteristics including:

- improving working conditions
- improving health and safety
- improving employee relations
- achieving better diversity

● ***How did the sustainability indicators perform?***

The Investment Manager uses the following indicators to measure the environmental or social characteristics promoted by the Fund:

- (i) Carbon intensity of the Fund (Scope 1 + 2) both absolute and relative to its Benchmark;
- (ii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iii) Percentage of women on boards of investee companies;
- (iv) Percentage of independent directors on boards of investee companies;
- (v) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) Carbon intensity (Scope 1 + 2):
  - a. Fund: 18.9 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 113.3 tons of CO<sub>2</sub>e / \$1m of Sales
- (ii) Percentage of investee companies with credible Net Zero Carbon strategies: 32%
- (iii) Percentage of women on boards of investee companies: 36%
- (iv) Percentage of independent directors on boards of investee companies: 74%
- (v) Percentage of companies which have an anti-bribery policy: 85%

Note: The benchmark is the Fund's official benchmark, i.e. the MSCI Europe Small Cap (Capital Return) Index.

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

● ***...and compared to previous periods?***

N/A. 2022 is the first reporting period.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A. The Fund does not have an objective of making sustainable investments.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A. The Fund does not have an objective of making sustainable investments.

- — *How were the indicators for adverse impacts on sustainability factors taken into account?*

N/A. The Fund does not have an objective of making sustainable investments.

- — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

N/A. The Fund does not have an objective of making sustainable investments.

Impact Cubed made an assessment of the Fund and, based on their findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;
- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund's holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company's score – whether per section or in aggregate – will result in further investigation and possible engagement with the company.

During the year, the Investment Manager engaged with 11 companies held in the Fund in respect of the following:

- Climate: 3
- Environment: 1
- Social: 3
- Governance: 4

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



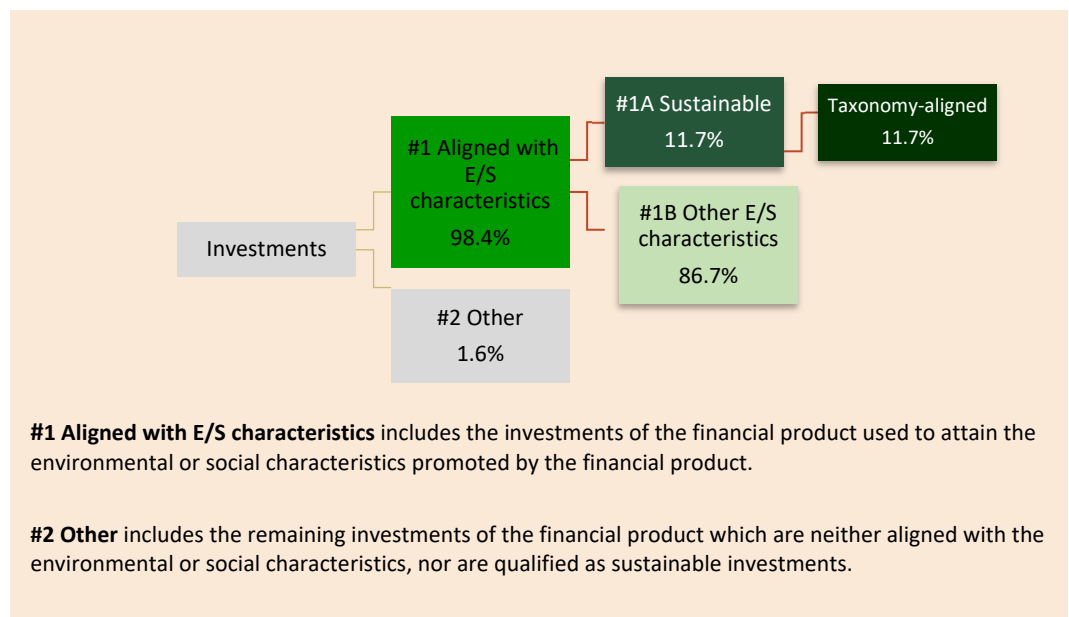
### What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
IMCD NV	Industrials	4.0%	Netherlands
4IMPRINT GROUP PLC	Communication Services	3.6%	UK
MTU AERO ENGINES AG	Industrials	3.5%	Germany
SARTORIUS STEDIM BIOTECH	Health Care	3.0%	France
CTS EVENTIM AG & CO KGAA	Communication Services	3.0%	Germany
MONCLER SPA	Consumer Discretionary	2.7%	Italy
KAINOS GROUP PLC	Information Technology	2.6%	UK
BREMBO SPA	Consumer Discretionary	2.6%	Italy
TECAN GROUP AG-REG	Health Care	2.6%	Switzerland
DIPLOMA PLC	Industrials	2.5%	UK
VZ HOLDING AG	Financials	2.5%	Switzerland
MELEXIS NV	Information Technology	2.5%	Belgium
BELIMO HOLDING AG-REG	Industrials	2.4%	Switzerland
REPLY SPA	Information Technology	2.4%	Italy
SPIRAX-SARCO ENGINEERING	Industrials	2.4%	UK

### What was the proportion of sustainability-related investments?

#### ● What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of

#### ● *In which economic sectors were the investments made?*

Energy	0.0%
Materials	4.0%
Industrials	24.7%
Consumer Discretionary	11.1%
Consumer Staples	4.2%
Health Care	18.4%
Financials	6.9%
Information Technology	18.4%
Communication Services	6.6%
Utilities	0.0%
Real Estate	4.1%
CASH	1.6%



#### **To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

N/A. The Fund did not make sustainable investments aligned with the EU Taxonomy.

However, as at 31 December 2022, the Fund had the following alignment with the EU Taxonomy:

- 11.7% by Turnover
- 13.4% by CapEx

**Asset allocation** describes the share of investments in specific assets.

- 11.7% by OpEx

● **Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

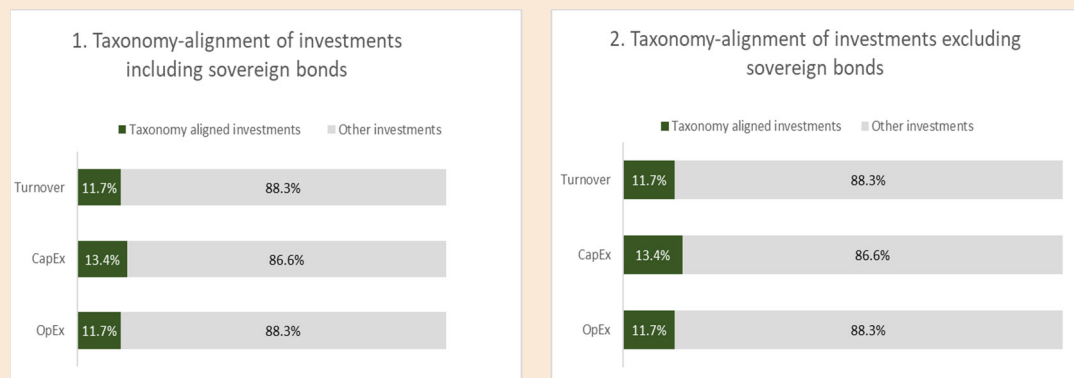
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**



*\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures*

As at 31 December 2022, the Fund's 11.7% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

<b>Climate Change Mitigation - TOTAL</b>	<b>11.1%</b>
<b>Construction and real estate activities</b>	
Construction of new buildings	0.6%
Acquisition of buildings	3.0%
<b>Manufacturing</b>	
Manufacture of low carbon technologies	7.5%
Manufacture of other inorganic basic chemicals	0.0%
Manufacture of plastics in primary form	0.0%
Manufacture of other organic basic chemicals	0.0%
Manufacture of iron and steel	0.0%
Manufacture of fertilizers and nitrogen compounds	0.0%
Manufacture of cement	0.0%
Manufacture of aluminium	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>0.6%</b>
<b>Finance and Insurance</b>	
Non-life insurance	<b>0.6%</b>
<b>TOTAL ALIGNMENT</b>	<b>11.7%</b>

● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no specific target exposure, 8.1% of the Fund’s investments were in transitional and enabling activities at 31 December 2022:

1. Total Taxonomy Aligned Investments	11.7%
<u>1.1 Total transitional activities</u>	0.0%
1.1.1 Of which contributes to climate mitigation transitional activities	0.0%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	8.1%
1.1.1 Of which contributes to climate mitigation enabling activities	7.5%
1.1.2 Of which contributes to climate adaptation enabling activities	0.6%

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A. This is the first reporting period.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

N/A. The Fund does not have sustainable investments.



## What was the share of socially sustainable investments?

N/A. The Fund does not have sustainable investments.



## What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

Only Cash was included under “Other”.



## What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the year, the Investment Manager engaged with 11 companies held in the Fund in respect of the following:

- Climate: 3
- Environment: 1
- Social: 3
- Governance: 4

As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.



## How did this financial product perform compared to the reference benchmark?

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

- *How does the reference benchmark differ from a broad market index?*

N/A

- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

N/A

- *How did this financial product perform compared with the reference benchmark?*

N/A

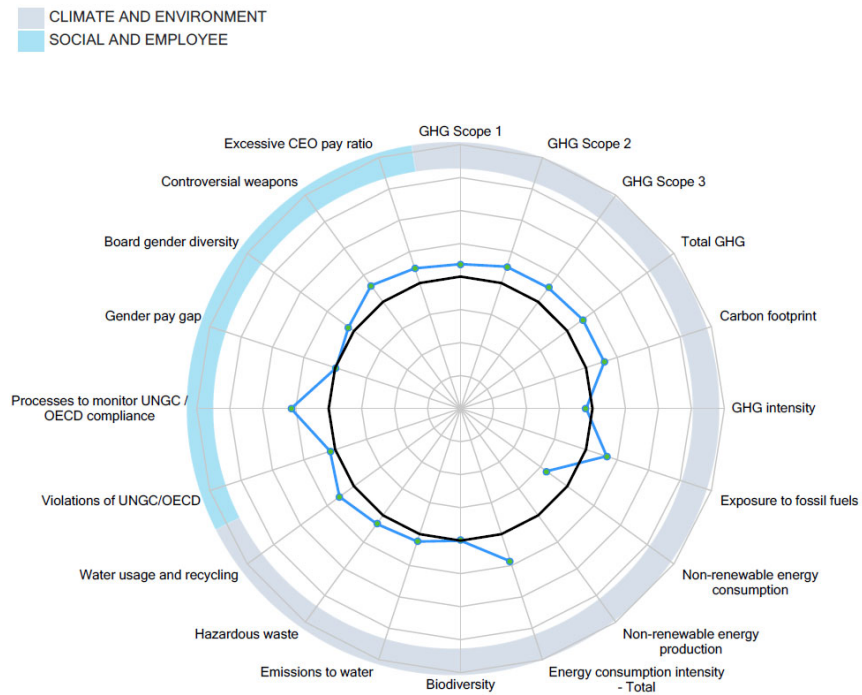
- *How did this financial product perform compared with the broad market index?*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



The reference benchmark for the Fund is the MSCI Europe Small Cap (Capital Return) index.

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the benchmark (black line) across 20 Principal Adverse Impact indicators. When the blue line sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to its benchmark, the MSCI Europe Small Cap (Capital Return) index, as at 31 December 2022:

PAI MEASURES					
	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	2,160	70%	36,770	69%
GHG Scope 2	scope 2 GHG emissions	2,790	64%	16,520	59%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	181,630	0%	525,470	12%
Total GHG	total GHG emissions	186,580	0%	578,760	10%
Carbon footprint	carbon footprint	450.66	0%	1,397.93	10%
GHG intensity	ghg intensity of investee companies	1,515.68	0%	1,315.21	10%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	0.00%	100%	4.77%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	65.76%	18%	61.85%	10%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	46.89%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.11	32%	0.47	25%
Energy consumption intensity - NACE Sector A	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	0.16	0%
Energy consumption intensity - NACE Sector B	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	N/A	N/A	1.39	8%
Energy consumption intensity - NACE Sector C	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.17	37%	0.43	30%
Energy consumption intensity - NACE Sector D	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	N/A	N/A	3.93	22%
Energy consumption intensity - NACE Sector E	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	N/A	N/A	0.47	0%
Energy consumption intensity - NACE Sector F	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	0.09	100%	0.09	27%
Energy consumption intensity - NACE Sector G	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	0.02	100%	1.20	25%
Energy consumption intensity - NACE Sector H	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	2.06	0%	1.52	12%
Energy consumption intensity - NACE Sector L	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	0.16	32%	0.33	46%

	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity -sensitive areas where activities of those investee companies negatively affect those areas	0.00%	0%	0.00%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	5.41	0%	497.05	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.72	23%	45.22	11%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	270.42	0%	5,606.63	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.17%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	41.43%	100%	58.26%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	87.33%	0%	87.38%	0%
Board gender diversity	average ratio of female to male board members in investee companies	34.68%	86%	33.54%	92%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	0.97%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	32.01	0%	36.61	0%

## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro UK Income Fund

**Legal entity identifier:** 635400QDCQQQGXYS5U77

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*



**Yes**



**No**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It made **sustainable investments with a social objective:** \_\_\_\_%



It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 25.7% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promoted E/S characteristics, but **did not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

The Fund seeks to promote environmental characteristics including:

- the prevention of climate change
- the reduction of greenhouse gas emissions
- the prevention of resource depletion
- the reduction of waste and pollution

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund seeks to promote social characteristics including:

- improving working conditions
- improving health and safety
- improving employee relations
- achieving better diversity

● ***How did the sustainability indicators perform?***

The Investment Manager uses the following indicators to measure the environmental or social characteristics promoted by the Fund:

- (i) Carbon intensity of the Fund (Scope 1 + 2) both absolute and relative to its Benchmark;
- (ii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iii) Percentage of women on boards of investee companies;
- (iv) Percentage of independent directors on boards of investee companies;
- (v) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) Carbon intensity (Scope 1 + 2):
- (ii)
  - a. Fund: 25.9 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 125.6 tons of CO<sub>2</sub>e / \$1m of Sales
- (iii) Percentage of investee companies with credible Net Zero Carbon strategies: 56.8%
- (iv) Percentage of women on boards of investee companies: 36%
- (v) Percentage of independent directors on boards of investee companies: 69%
- (vi) Percentage of companies which have an anti-bribery policy: 88%

Note: The benchmark is the Fund's official benchmark, i.e. the IA UK All Companies Sector (Total Return).

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

● ***...and compared to previous periods?***

N/A. 2022 is the first reporting period.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A. The Fund does not have an objective of making sustainable investments.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A. The Fund does not have an objective of making sustainable investments.

- — *How were the indicators for adverse impacts on sustainability factors taken into account?*

N/A. The Fund does not have an objective of making sustainable investments.

- — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

N/A. The Fund does not have an objective of making sustainable investments.

Impact Cubed made an assessment of the Fund and, based on their findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;
- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund's holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company's score – whether per section or in aggregate – will result in further investigation and possible engagement with the company.

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 4
- Environment: 2
- Social: 1
- Governance: 2

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



### What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
GAMES WORKSHOP GROUP PLC	Consumer Discretionary	3.7%	UK
4IMPRINT GROUP PLC	Communication Services	3.6%	UK
KAINOS GROUP PLC	Information Technology	3.5%	UK
BIG YELLOW GROUP PLC	Real Estate	3.2%	UK
DIPLOMA PLC	Industrials	3.1%	UK
CLARKSON PLC	Industrials	3.1%	UK
RATHBONES GROUP PLC	Financials	3.0%	UK
DISCOVERIE GROUP PLC	Industrials	3.0%	UK
ST JAMES'S PLACE PLC	Financials	2.9%	UK
SEVERN TRENT PLC	Utilities	2.8%	UK
NCAB GROUP AB	Information Technology	2.7%	Sweden
NCC GROUP PLC	Information Technology	2.7%	UK
BLOOMSBURY PUBLISHING PLC	Communication Services	2.6%	UK
GREGGS PLC	Consumer Discretionary	2.4%	UK
TAYLOR WIMPEY PLC	Consumer Discretionary	2.4%	UK

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:



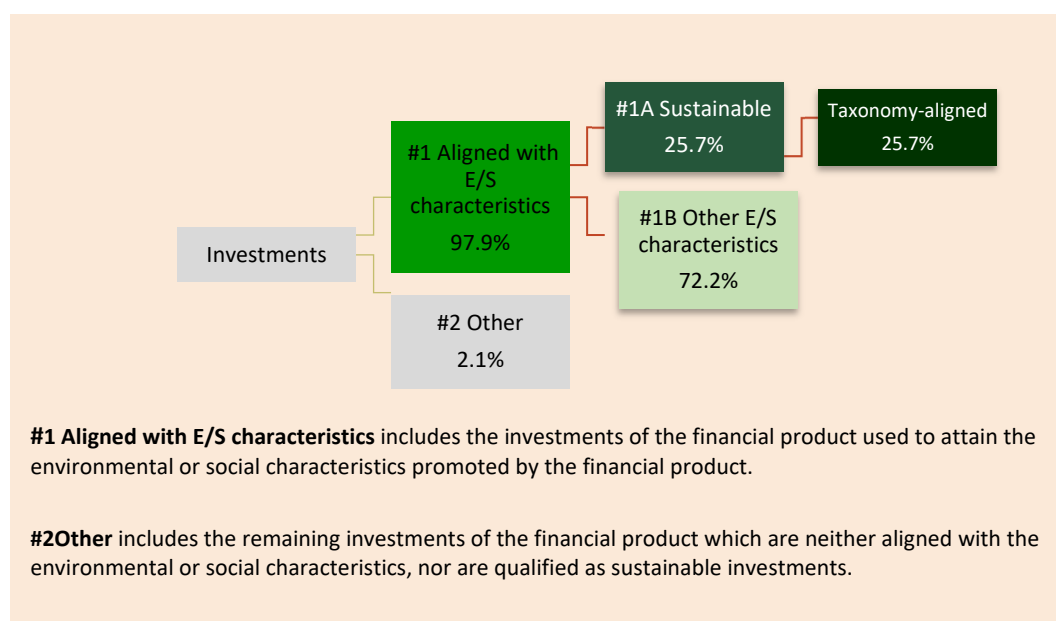
### What was the proportion of sustainability-related investments?

#### ● What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



#### ● In which economic sectors were the investments made?

Energy	0.0%
Materials	2.3%
Industrials	21.0%
Consumer Discretionary	12.5%
Consumer Staples	4.8%
Health Care	1.5%
Financials	16.4%
Information Technology	17.0%
Communication Services	6.2%
Utilities	5.8%
Real Estate	10.5%
CASH	2.1%



#### To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A. The Fund did not make sustainable investments aligned with the EU Taxonomy.

However, as at 31 December 2022, the Fund had the following alignment with the EU Taxonomy:

- 25.7% by Turnover
- 25.7% by CapEx



- 25.7% by OpEx

● **Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**



Yes:



In fossil gas



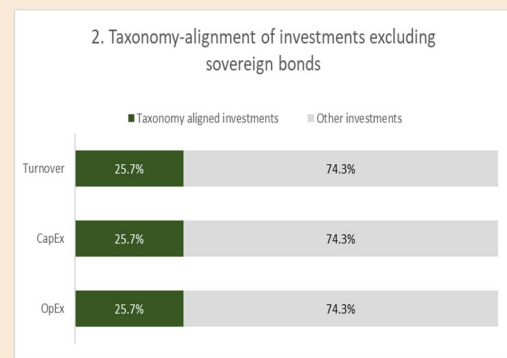
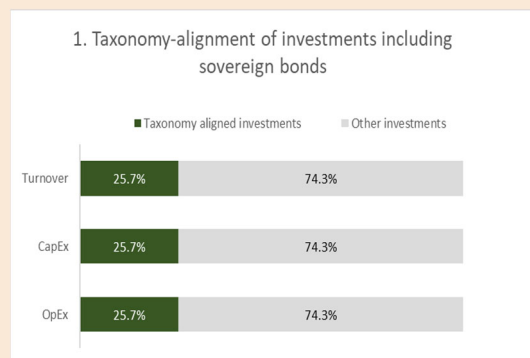
In nuclear energy



No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**




*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

As at 31 December 2022, the Fund’s 25.7% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

UK Income Fund	
<b>Climate Change Mitigation - TOTAL</b>	<b>21.3%</b>
<b>Construction and real estate activities</b>	
Construction of new buildings	6.1%
Acquisition of buildings	9.6%
<b>Water, sewerage, waste and remediation</b>	
Water collection, treatment and supply	4.8%
Manufacturing	
Manufacture of low carbon technologies	0.8%
Manufacture of aluminium	0.0%
Manufacture of iron and steel	0.0%
Manufacture of plastics in primary form	0.0%
Manufacture of other organic basic chemicals	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>4.4%</b>
<b>Finance and Insurance</b>	
Non-life insurance	4.4%
<b>TOTAL ALIGNMENT</b>	<b>25.7%</b>

● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no specific target exposure, 5.2% of the Fund’s investments were in transitional and enabling activities at 31 December 2022:

1. Total Taxonomy Aligned Investments	25.7%
<u>1.1 Total transitional activities</u>	0.0%
1.1.1 Of which contributes to climate mitigation transitional activities	0.0%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	5.2%
1.1.1 Of which contributes to climate mitigation enabling activities	0.8%
1.1.2 Of which contributes to climate adaptation enabling activities	4.4%

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A. This is the first reporting period.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

N/A. The Fund does not have sustainable investments.



**What was the share of socially sustainable investments?**

N/A. The Fund does not have sustainable investments.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

Only Cash was included under “Other”.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 4
- Environment: 2
- Social: 1
- Governance: 2



As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.

**How did this financial product perform compared to the reference benchmark?**

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

- ***How does the reference benchmark differ from a broad market index?***

N/A

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

N/A

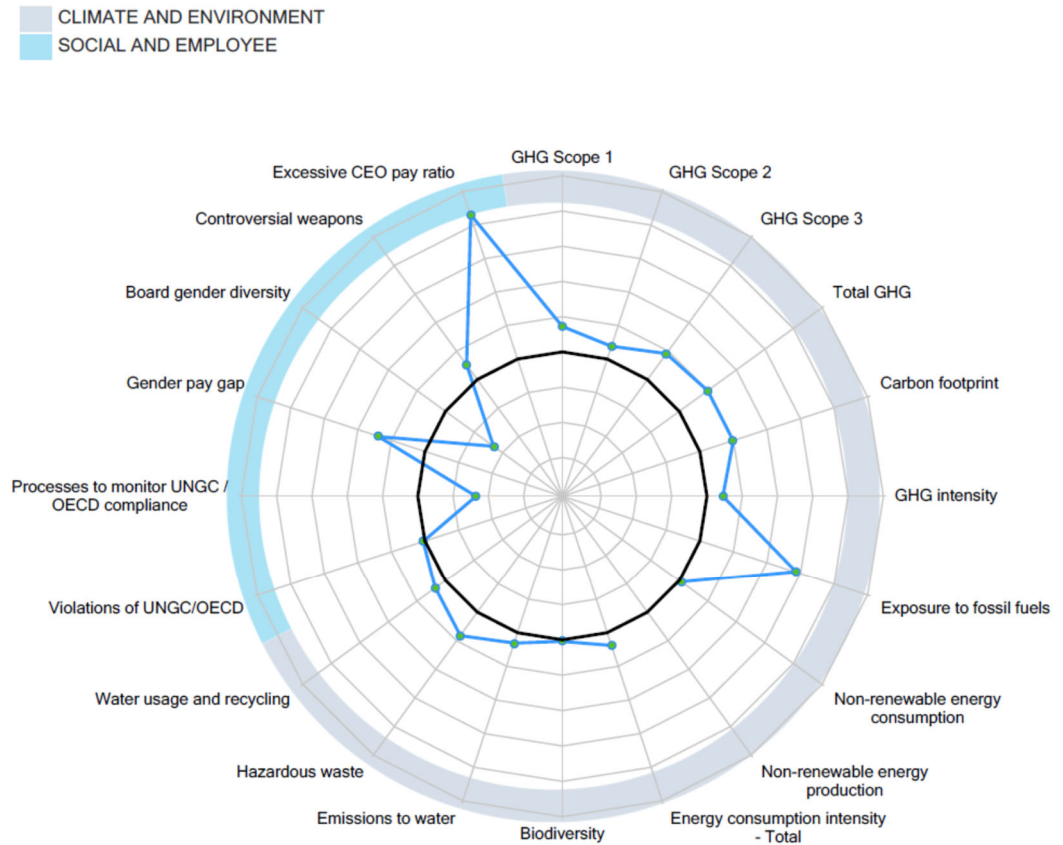
- ***How did this financial product perform compared with the reference benchmark?***

N/A

● **How did this financial product perform compared with the broad market index?**

The benchmark of the Fund is the IA UK All Companies Sector.

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the benchmark (black line) across 20 Principal Adverse Impact indicators. When the blue line sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to its benchmark, the IA UK All Companies Sector, as at 31 December 2022:

PAI MEASURES					
	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	7,730	95%	68,840	61%
GHG Scope 2	scope 2 GHG emissions	6,850	82%	21,540	60%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	379,900	7%	865,820	33%
Total GHG	total GHG emissions	394,470	7%	956,200	11%
Carbon footprint	carbon footprint	533.52	7%	1,293.25	11%
GHG intensity	ghg intensity of investee companies	1,039.43	7%	1,341.47	11%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	0.00%	100%	20.93%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	61.39%	10%	61.66%	50%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	68.43%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.20	24%	0.33	78%
Energy consumption intensity - NACE Sector A (Agriculture, forestry and fishing)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	0.16	0%
Energy consumption intensity - NACE Sector B (Mining and quarrying)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	N/A	N/A	1.05	58%
Energy consumption intensity - NACE Sector C (Manufacturing)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.37	58%	0.23	91%
Energy consumption intensity - NACE Sector D (Electricity, gas, steam and air conditioning supply)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	N/A	N/A	1.75	84%
Energy consumption intensity - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	0.44	25%	0.44	40%
Energy consumption intensity - NACE Sector F (Construction)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	0.12	0%	0.09	49%
Energy consumption intensity - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	0.06	44%	0.61	56%
Energy consumption intensity - NACE Sector H (Transporting and storage)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	2.06	0%	2.47	35%
Energy consumption intensity - NACE Sector L (Real estate activities)	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	0.08	39%	0.31	61%

	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity -sensitive areas where activities of those investee companies negatively affect those areas	0.00%	0%	0.08%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	32.93	0%	217.86	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	1.70	2%	229.16	40%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	2,436.53	0%	3,829.03	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.09%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	38.90%	100%	14.61%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	85.06%	0%	84.53%	0%
Board gender diversity	average ratio of female to male board members in investee companies	34.82%	96%	40.29%	99%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	1.78%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	27.63	0%	79.80	0%



## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1g, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro European Income Fund

**Legal entity identifier:** 635400NIKW6KIUJQQG41

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*

☒ ☒ ☐ **Yes**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective:** \_\_\_\_%

☒ ☐ ☒ **No**

☒ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 18.9% of sustainable investments

☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective

☒ It promoted E/S characteristics, but **did not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

The Fund seeks to promote environmental characteristics including:

- the prevention of climate change
- the reduction of greenhouse gas emissions
- the prevention of resource depletion

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- the reduction of waste and pollution

The Fund seeks to promote social characteristics including:

- improving working conditions
- improving health and safety
- improving employee relations
- achieving better diversity

#### ● ***How did the sustainability indicators perform?***

The Investment Manager uses the following indicators to measure the environmental or social characteristics promoted by the Fund:

- (i) Carbon intensity of the Fund (Scope 1 + 2) both absolute and relative to its Benchmark;
- (ii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iii) Percentage of women on boards of investee companies;
- (iv) Percentage of independent directors on boards of investee companies;
- (v) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) Carbon intensity (Scope 1 + 2):
  - a. Fund: 78.2 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 121.1 tons of CO<sub>2</sub>e / \$1m of Sales
- (ii) Percentage of investee companies with credible Net Zero Carbon strategies: 37%
- (iii) Percentage of women on boards of investee companies: 38%
- (iv) Percentage of independent directors on boards of investee companies: 67%
- (v) Percentage of companies which have an anti-bribery policy: 93%

Note: The benchmark is the Fund's official benchmark, i.e. the IA Europe (excluding UK) Sector (Total Return).

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

#### ● ***...and compared to previous periods?***

N/A. 2022 is the first reporting period.

#### ● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A. The Fund does not have an objective of making sustainable investments.



**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A. The Fund does not have an objective of making sustainable investments.

- — **How were the indicators for adverse impacts on sustainability factors taken into account?**

N/A. The Fund does not have an objective of making sustainable investments.

- — **Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

N/A. The Fund does not have an objective of making sustainable investments.

Impact Cubed made an assessment of the Fund and, based on their findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;
- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund’s holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company’s score – whether per section or in aggregate – will result in further investigation and possible engagement with the company.

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 4
- Environment: 2
- Social: 1
- Governance: 2

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



### What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
LOOMIS AB	Industrials	3.6%	Sweden
AMUNDI SA	Financials	3.5%	France
KITRON ASA	Information Technology	3.5%	Norway
MTU AERO ENGINES AG	Industrials	3.2%	Germany
RECORDATI INDUSTRIA CHIMICA	Health Care	3.0%	Italy
BRENNTAG SE	Industrials	3.0%	Germany
EDENRED	Information Technology	3.0%	France
BUREAU VERITAS SA	Industrials	3.0%	France
GAZTRANSPORT ET TECHNIGAS	Energy	2.9%	France
BURCKHARDT COMPRESSION II	Industrials	2.9%	Switzerland
VISCOFAN SA	Consumer Staples	2.8%	Spain
MONCLER SPA	Consumer Discretionary	2.8%	Italy
GALENICA AG	Health Care	2.7%	Switzerland
TERNA-RETE ELETTRICA NAZIONALE	Utilities	2.6%	Italy
AMADEUS FIRE AG	Industrials	2.6%	Germany

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:



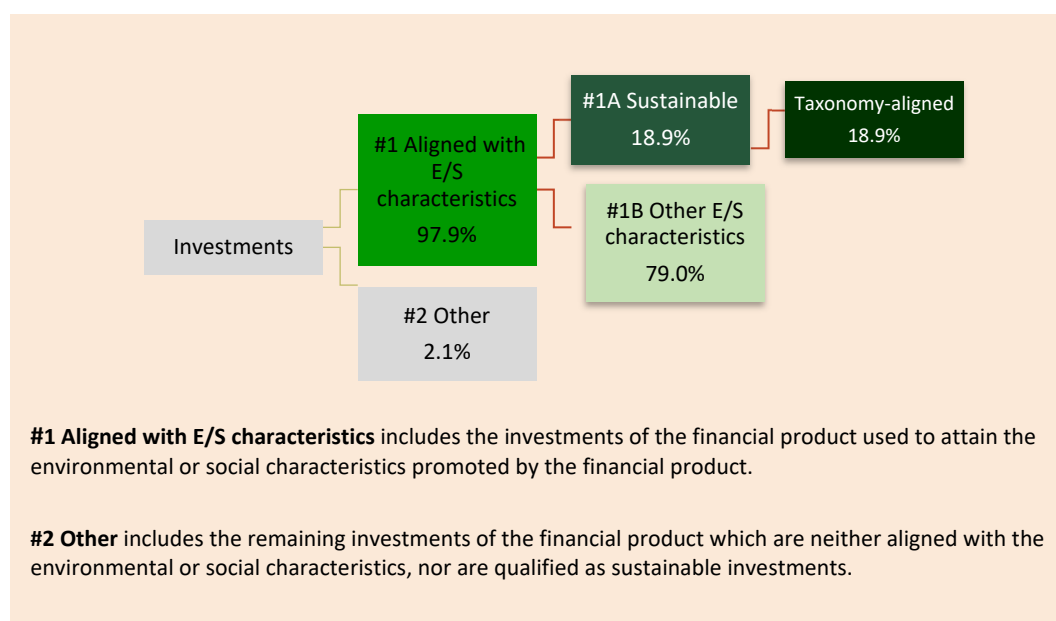
### What was the proportion of sustainability-related investments?

#### ● What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



#### ● *In which economic sectors were the investments made?*

Energy	2.9%
Materials	6.9%
Industrials	29.2%
Consumer Discretionary	8.9%
Consumer Staples	4.6%
Health Care	6.6%
Financials	10.6%
Information Technology	19.9%
Communication Services	0.6%
Utilities	3.7%
Real Estate	3.9%
CASH	2.1%



#### **To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

As at 31 December 2022, the Fund had the following alignment with the EU Taxonomy:

- 18.9% by Turnover
- 18.9% by CapEx
- 18.9% by OpEx

**Asset allocation** describes the share of investments in specific assets.

- Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?



Yes:



In fossil gas



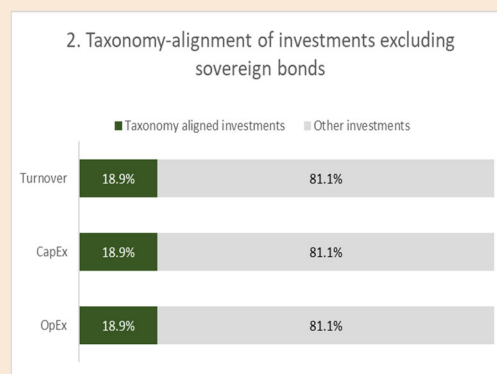
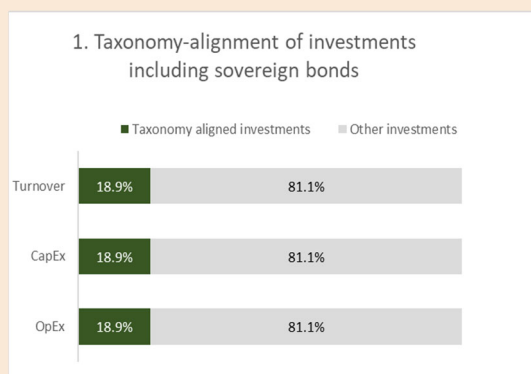
In nuclear energy



No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**



*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

As at 31 December 2022, the Fund’s 18.9% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities are** activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

<b>Climate Change Mitigation - TOTAL</b>	<b>16.4%</b>
<b>Construction and real estate activities</b>	
Acquisition of buildings	4.2%
Construction of new buildings	4.9%
<b>Manufacturing</b>	
Manufacture of low carbon technologies	4.5%
Manufacture of other inorganic basic chemicals	0.0%
Manufacture of other organic basic chemicals	0.0%
Manufacture of iron and steel	0.0%
Manufacture of cement	0.0%
Manufacture of aluminium	0.0%
Manufacture of fertilizers and nitrogen compounds	0.0%
<b>Electricity, gas, steam and air conditioning supply</b>	
Transmission and distribution of electricity	2.8%
Production of electricity from hydropower	0.0%
Production of electricity from gas combustion	0.0%
Production of electricity from wind power	0.0%
Production of electricity from bioenergy	0.0%
Production of electricity from solar PV	0.0%
Production of electricity from geothermal	0.0%
Manufacture of biomass, biogas or biofuels	0.0%
Production of electricity from ocean energy	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>2.4%</b>
<b>Finance and Insurance</b>	
Non-life insurance	2.4%
<b>TOTAL ALIGNMENT</b>	<b>18.9%</b>

● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no specific target exposure, 9.7% of the Fund’s investments were in transitional and enabling activities at 31 December 2022:

1. Total Taxonomy Aligned Investments	18.9%
<u>1.1 Total transitional activities</u>	0.0%
1.1.1 Of which contributes to climate mitigation transitional activities	0.0%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	9.7%
1.1.1 Of which contributes to climate mitigation enabling activities	7.3%
1.1.2 Of which contributes to climate adaptation enabling activities	2.4%

- ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?***

N/A. This is the first reporting period.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

N/A. The Fund does not have sustainable investments.



**What was the share of socially sustainable investments?**

N/A. The Fund does not have sustainable investments.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

Only Cash was included under “Other”.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 4
- Environment: 2
- Social: 1
- Governance: 2

As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.



**How did this financial product perform compared to the reference benchmark?**

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

- ***How does the reference benchmark differ from a broad market index?***

N/A

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

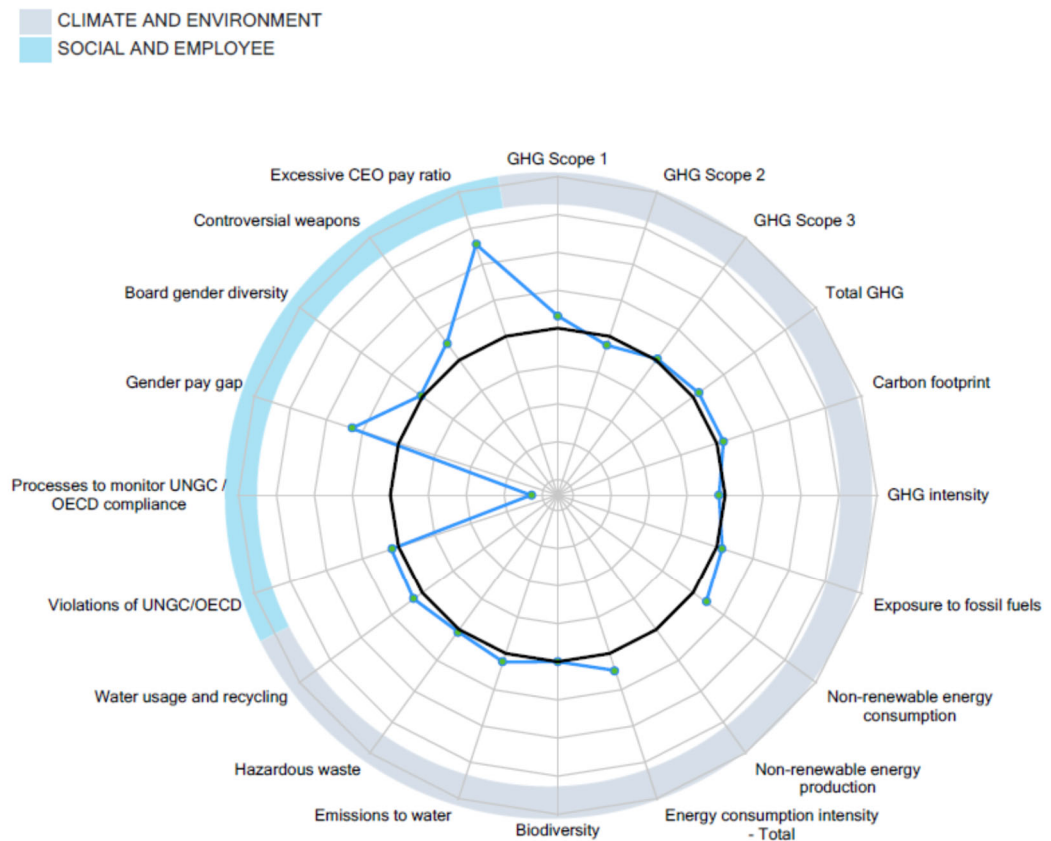
N/A

- **How did this financial product perform compared with the reference benchmark?**

N/A

- **How did this financial product perform compared with the broad market index?**

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the MSCI Europe ex-UK Small Cap index (black line) across 20 Principal Adverse Impact indicators. When the blue line sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to the MSCI Europe ex-UK Small Cap index, as at 31 December 2022:



	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	9,320	63%	40,390	70%
GHG Scope 2	scope 2 GHG emissions	12,760	57%	8,130	59%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	174,800	2%	180,290	37%
Total GHG	total GHG emissions	196,880	2%	228,800	26%
Carbon footprint	carbon footprint	681.95	2%	792.52	26%
GHG intensity	ghg intensity of investee companies	1,209.67	2%	1,113.90	26%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	6.73%	100%	8.00%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	60.24%	14%	63.18%	56%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	84.45%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.33	35%	0.57	80%
Energy consumption intensity - NACE Sector A	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	0.18	100%
Energy consumption intensity - NACE Sector B	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	2.38	0%	1.57	44%
Energy consumption intensity - NACE Sector C	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.12	55%	0.49	84%
Energy consumption intensity - NACE Sector D	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	1.37	41%	5.62	85%
Energy consumption intensity - NACE Sector E	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	N/A	N/A	2.59	100%
Energy consumption intensity - NACE Sector F	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	0.11	0%	0.79	87%
Energy consumption intensity - NACE Sector G	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	0.05	26%	0.08	71%
Energy consumption intensity - NACE Sector H	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	0.27	0%	0.63	65%
Energy consumption intensity - NACE Sector L	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	0.40	100%	0.38	86%



	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.00%	0%	0.00%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	114.98	0%	827.75	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	1.09	19%	2.27	54%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	2,814.37	0%	5,936.60	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.44%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	61.07%	100%	10.19%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	88.53%	0%	87.12%	0%
Board gender diversity	average ratio of female to male board members in investee companies	37.46%	90%	37.28%	100%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	1.94%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	30.54	0%	66.67	0%

## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro European MidCap Fund

**Legal entity identifier:** 6354001PHJU2IW4SCG72

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*



**Yes**



**No**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It made **sustainable investments with a social objective:** \_\_\_\_%



**It promoted Environmental/Social (E/S) characteristics and**

while it did not have as its objective a sustainable investment, it had a proportion of 7.8% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



**It promoted E/S characteristics, but did not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

The Fund seeks to promote environmental characteristics including:

- the prevention of climate change
- the reduction of greenhouse gas emissions

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- the prevention of resource depletion
- the reduction of waste and pollution

The Fund seeks to promote social characteristics including:

- improving working conditions
- improving health and safety
- improving employee relations
- achieving better diversity

#### ● ***How did the sustainability indicators perform?***

The Investment Manager uses the following indicators to measure the environmental or social characteristics promoted by the Fund:

- (i) Carbon intensity of the Fund (Scope 1 + 2) both absolute and relative to its Benchmark;
- (ii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iii) Percentage of women on boards of investee companies;
- (iv) Percentage of independent directors on boards of investee companies;
- (v) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) Carbon intensity (Scope 1 + 2):
  - a. Fund: 28.5 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 138.0 tons of CO<sub>2</sub>e / \$1m of Sales
- (ii) Percentage of investee companies with credible Net Zero Carbon strategies: 52.7%
- (iii) Percentage of women on boards of investee companies: 39%
- (iv) Percentage of independent directors on boards of investee companies: 66%
- (v) Percentage of companies which have an anti-bribery policy: 88%

Note: The benchmark is the Fund's official benchmark, i.e. the STOXX Europe Mid 200 (Capital Return) Index.

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

#### ● ***...and compared to previous periods?***

N/A. 2022 is the first reporting period.

#### ● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A. The Fund does not have an objective of making sustainable investments.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A. The Fund does not have an objective of making sustainable investments.

- — — *How were the indicators for adverse impacts on sustainability factors taken into account?*

N/A. The Fund does not have an objective of making sustainable investments.

- — — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

N/A. The Fund does not have an objective of making sustainable investments.

Impact Cubed made an assessment of the Fund and, based on their findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;
- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund’s holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company’s score – whether per section or in aggregate – will result in further investigation

and possible engagement with the company.

During the year, the Investment Manager engaged with 4 companies held in the Fund in respect of the following:

- Climate: 1
- Environment: 0
- Social: 1
- Governance: 2

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



### What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:

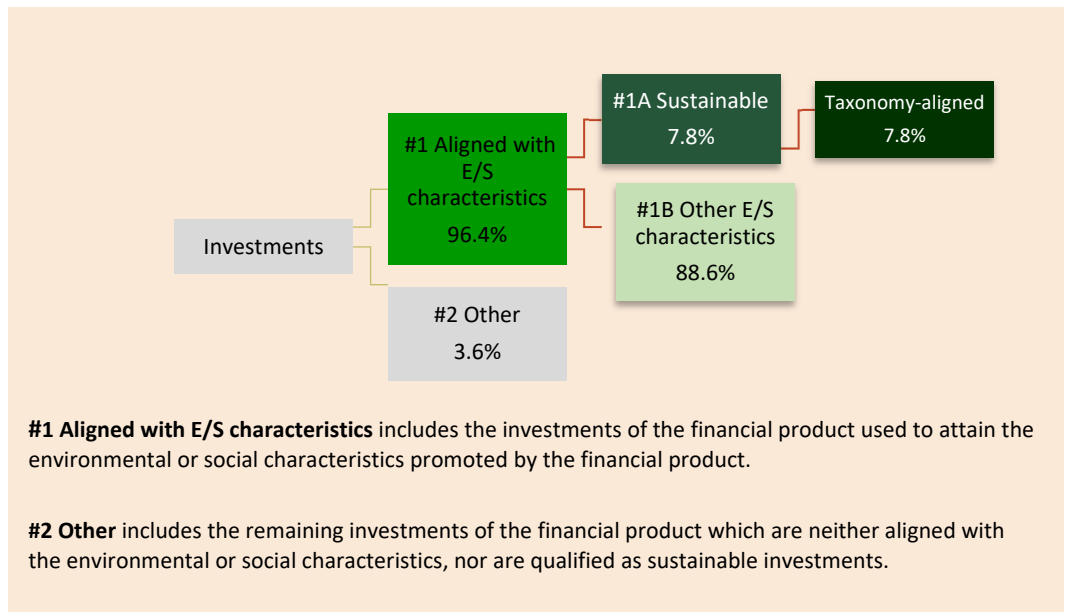
Largest investments	Sector	% Assets	Country
EDENRED	Information Technology	5.5%	France
RENTOKIL INITIAL PLC	Industrials	5.2%	UK
MONCLER SPA	Consumer Discretionary	5.1%	Italy
DIPLOMA PLC	Industrials	4.8%	UK
ASHTREAD GROUP PLC	Industrials	4.7%	UK
RS GROUP PLC	Industrials	4.6%	UK
WORLDLINE SA	Information Technology	4.5%	France
MTU AERO ENGINES AG	Industrials	4.4%	Germany
ST JAMES'S PLACE PLC	Financials	4.3%	UK
RECORDATI INDUSTRIA CHIMICI	Health Care	4.2%	Italy
IMCD NV	Industrials	4.2%	Netherlands
AMUNDI SA	Financials	4.2%	France
REPLY SPA	Information Technology	4.1%	Italy
WAREHOUSES DE PAUW SCA	Real Estate	4.1%	Belgium
TELEPERFORMANCE	Industrials	4.0%	France



### What was the proportion of sustainability-related investments?

#### ● What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.



● **In which economic sectors were the investments made?**

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.

Energy	0.0%
Materials	3.3%
Industrials	34.3%
Consumer Discretionary	5.1%
Consumer Staples	0.0%
Health Care	18.9%
Financials	8.4%
Information Technology	19.8%
Communication Services	0.0%
Utilities	2.4%
Real Estate	4.1%
CASH	3.6%



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

N/A. The Fund did not make sustainable investments aligned with the EU Taxonomy.

However, as at 31 December 2022, the Fund had the following alignment with the EU Taxonomy:

- 7.8% by Turnover
- 7.8% by CapEx

- 7.8% by OpEx

- Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?



Yes:



In fossil gas



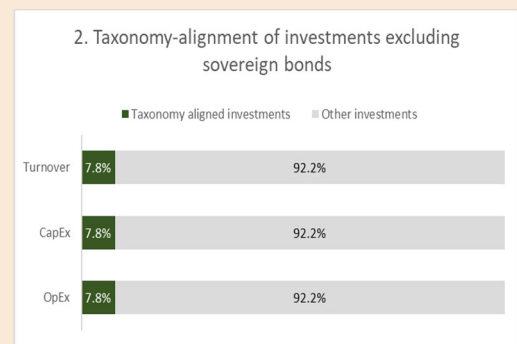
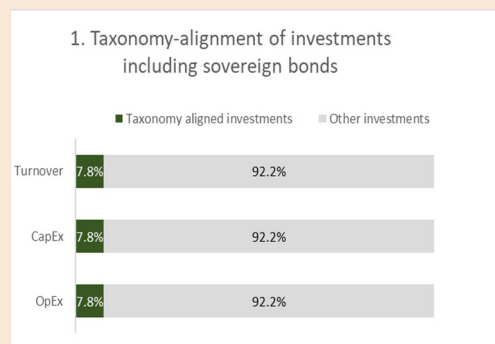
In nuclear energy



No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**



*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

As at 31 December 2022, the Fund’s 7.8% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

[include note for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 that invest in environmental economic activities that are not environmentally sustainable economic activities]



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

<b>Climate Change Mitigation - TOTAL</b>	<b>7.8%</b>
<b>Construction and real estate activities</b>	
Acquisition of buildings	4.4%
Construction of new buildings	0.8%
<b>Electricity, gas, steam and air conditioning supply</b>	
Transmission and distribution of electricity	2.6%
Production of electricity from hydropower	0.0%
Production of electricity from gas combustion	0.0%
Production of electricity from wind power	0.0%
Production of electricity from bioenergy	0.0%
Production of electricity from solar PV	0.0%
Manufacture of biomass, biogas or biofuels	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>0.00%</b>
<b>TOTAL ALIGNMENT</b>	<b>7.8%</b>

● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no specific target exposure, 2.6% of the Fund’s investments were in transitional and enabling activities at 31 December 2022:

1. Total Taxonomy Aligned Investments	7.8%
<u>1.1 Total transitional activities</u>	0.0%
1.1.1 Of which contributes to climate mitigation transitional activities	0.0%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	2.6%
1.1.1 Of which contributes to climate mitigation enabling activities	2.6%
1.1.2 Of which contributes to climate adaptation enabling activities	0.0%

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A. This is the first reporting period.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

N/A. The Fund does not have sustainable investments.



**What was the share of socially sustainable investments?**

N/A. The Fund does not have sustainable investments.





### What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

Only Cash was included under “Other”.



### What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the year, the Investment Manager engaged with 4 companies held in the Fund in respect of the following:

- Climate: 1
- Environment: 0
- Social: 1
- Governance: 2



As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.

### How did this financial product perform compared to the reference benchmark?

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

#### ● *How does the reference benchmark differ from a broad market index?*

N/A

#### ● *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

N/A

#### ● *How did this financial product perform compared with the reference benchmark?*

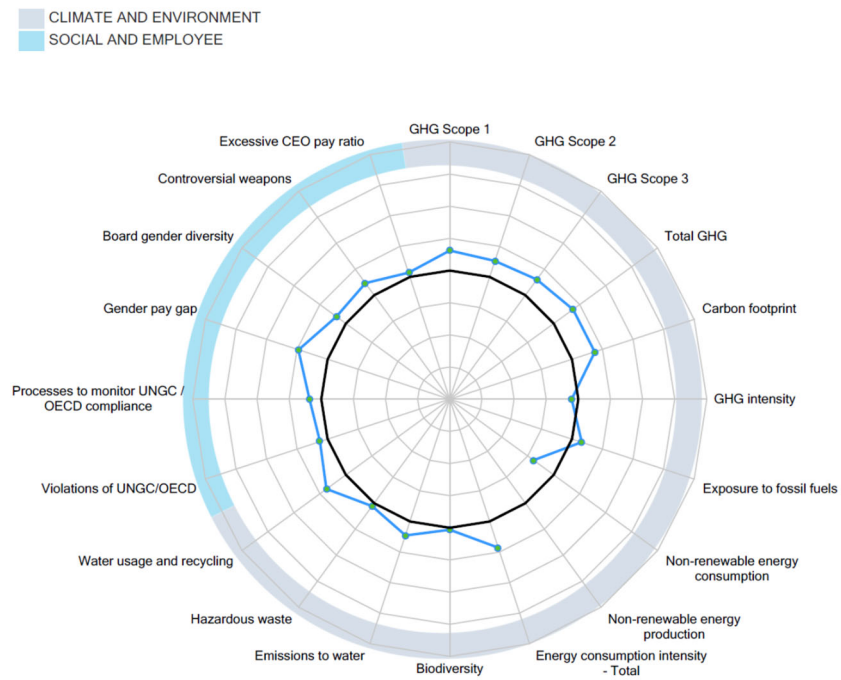
N/A

#### ● *How did this financial product perform compared with the broad market index?*

The benchmark of the Fund is the STOXX Europe Mid 200 (Capital Return) Index.

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the benchmark (black line) across 20 Principal Adverse Impact indicators. When the blue line

sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to its benchmark, the STOXX Europe Mid 200 (Capital Return) Index, as at 31 December 2022:

PAI MEASURES					
	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	290	86%	7,140	76%
GHG Scope 2	scope 2 GHG emissions	390	82%	4,360	69%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	38,440	0%	66,100	22%
Total GHG	total GHG emissions	39,120	0%	77,600	19%
Carbon footprint	carbon footprint	374.54	0%	743.03	19%
GHG intensity	ghg intensity of investee companies	997.35	0%	888.98	19%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	2.53%	100%	4.82%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	68.46%	34%	63.86%	37%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	66.80%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.07	70%	0.35	64%
Energy consumption intensity - NACE Sector A	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	0.18	100%
Energy consumption intensity - NACE Sector B	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	N/A	N/A	1.05	29%
Energy consumption intensity - NACE Sector C	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.10	82%	0.38	72%
Energy consumption intensity - NACE Sector D	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	0.09	100%	1.94	59%
Energy consumption intensity - NACE Sector E	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	N/A	N/A	1.73	80%
Energy consumption intensity - NACE Sector F	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	N/A	N/A	0.26	57%
Energy consumption intensity - NACE Sector G	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	0.02	72%	0.06	53%
Energy consumption intensity - NACE Sector H	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	N/A	N/A	1.08	64%
Energy consumption intensity - NACE Sector L	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	0.60	100%	0.36	89%

	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.00%	0%	0.11%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	4.40	0%	349.03	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.12	32%	11.34	31%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	298.45	0%	3,268.27	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.46%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	16.10%	100%	21.11%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	87.56%	0%	86.59%	0%
Board gender diversity	average ratio of female to male board members in investee companies	38.83%	95%	37.71%	99%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	1.70%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	52.85	0%	54.66	0%

## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro Global Innovation Fund

**Legal entity identifier:** 635400JTZQXXUIL9CM83

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*



**Yes**



**No**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective:** \_\_\_\_%

☒ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 10.6% of sustainable investments

- ☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☒ It promoted E/S characteristics, but **did not make any sustainable investments**



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

The Fund seeks to promote environmental characteristics including:

- the prevention of climate change
- the reduction of greenhouse gas emissions

- the prevention of resource depletion
- the reduction of waste and pollution

The Fund seeks to promote social characteristics including:

- improving working conditions
- improving health and safety
- improving employee relations
- achieving better diversity

#### ● ***How did the sustainability indicators perform?***

The Investment Manager uses the following indicators to measure the environmental or social characteristics promoted by the Fund:

- (i) Carbon intensity of the Fund (Scope 1 + 2) both absolute and relative to its Benchmark;
- (ii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iii) Percentage of women on boards of investee companies;
- (iv) Percentage of independent directors on boards of investee companies;
- (v) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) Carbon intensity (Scope 1 + 2):
  - a. Fund: 17.2 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 199.6 tons of CO<sub>2</sub>e / \$1m of Sales
- (ii) Percentage of investee companies with credible Net Zero Carbon strategies: 7.5%
- (iii) Percentage of women on boards of investee companies: 28%
- (iv) Percentage of independent directors on boards of investee companies: 77%
- (v) Percentage of companies which have an anti-bribery policy: 71%

Note: The benchmark is the Fund's official benchmark, i.e. the MSCI World SMID Cap (Total Return) Index.

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

#### ● ***...and compared to previous periods?***

N/A. 2022 is the first reporting period.

#### ● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A. The Fund does not have an objective of making sustainable investments.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A. The Fund does not have an objective of making sustainable investments.

- — — *How were the indicators for adverse impacts on sustainability factors taken into account?*

N/A. The Fund does not have an objective of making sustainable investments.

- — — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

N/A. The Fund does not have an objective of making sustainable investments.

Impact Cubed made an assessment of the Fund and, based on their findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;
- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund’s holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company’s score – whether per section or in aggregate – will result in further investigation

and possible engagement with the company.

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 1
- Environment: 2
- Social: 1
- Governance: 5

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



### What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:

Largest investments	Sector	% Assets	Country
TRANSMEDICS GROUP INC	Health Care	5.2%	United States of America
SARTORIUS STEDIM BIOTECH	Health Care	3.3%	France
XPEL INC	Consumer Discretionary	3.2%	United States of America
ANSYS INC	Information Technology	3.1%	United States of America
BRUKER CORP	Health Care	3.0%	United States of America
PAYCOM SOFTWARE INC	Information Technology	2.9%	United States of America
TECAN GROUP AG-REG	Health Care	2.8%	Switzerland
SOLAREEDGE TECHNOLOGIES INC	Information Technology	2.7%	United States of America
TYLER TECHNOLOGIES INC	Information Technology	2.7%	United States of America
ADYEN NV	Information Technology	2.6%	Netherlands
KAINOS GROUP PLC	Information Technology	2.6%	UK
BOKU INC	Information Technology	2.4%	UK
FORTNOX AB	Information Technology	2.4%	Sweden
TECHNOLOGY ONE LTD	Information Technology	2.4%	Australia
PRO MEDICUS LTD	Health Care	2.3%	Australia



### What was the proportion of sustainability-related investments?

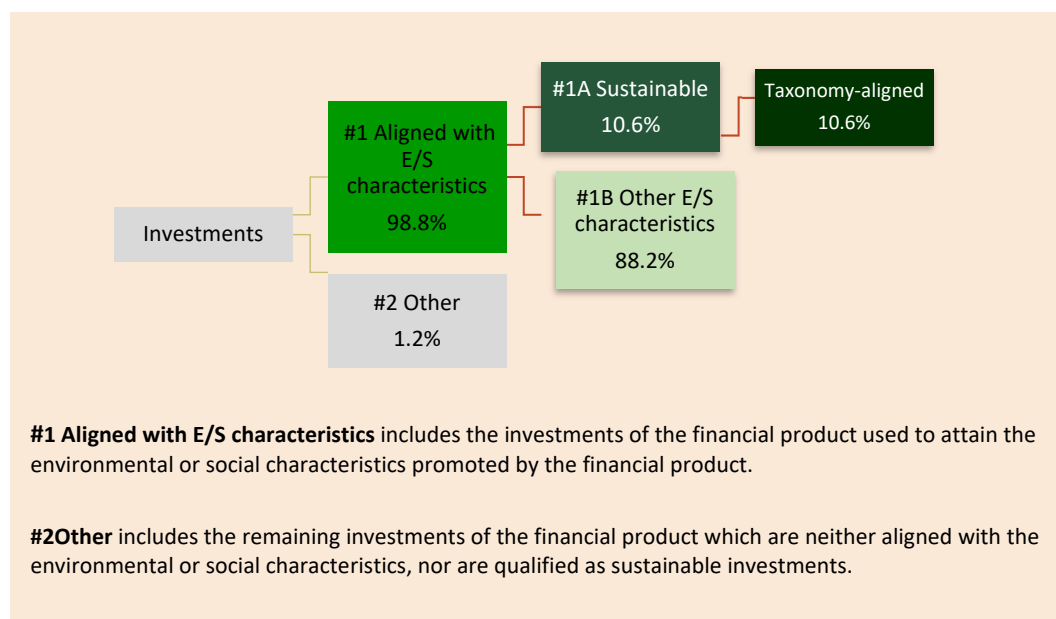
#### ● What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



#### ● *In which economic sectors were the investments made?*

Energy	0.0%
Materials	0.0%
Industrials	7.5%
Consumer Discretionary	7.1%
Consumer Staples	0.0%
Health Care	36.5%
Financials	0.0%
Information Technology	44.6%
Communication Services	3.0%
Utilities	0.0%
Real Estate	0.0%
CASH	1.2%



#### **To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

N/A. The Fund did not make sustainable investments aligned with the EU Taxonomy.

However, as at 31 December 2022, the Fund had the following alignment with the EU Taxonomy:

- 10.6% by Turnover
- 10.6% by CapEx
- 10.6% by OpEx

**Asset allocation** describes the share of investments in specific assets.

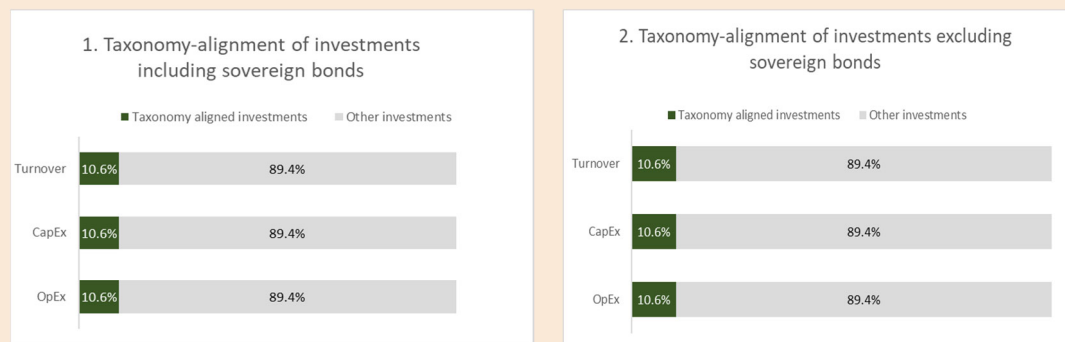
- Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

Yes: ☐ In fossil gas ☐ In nuclear energy

☒ No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**




*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

As at 31 December 2022, the Fund’s 10.6% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

<b>Climate Change Mitigation - TOTAL</b>	<b>10.6%</b>
<b>Manufacturing</b>	
Manufacture of low carbon technologies	8.5%
Manufacture of aluminium	0.0%
Manufacture of iron and steel	0.0%
Manufacture of cement	0.0%
Manufacture of fertilizers and nitrogen compounds	0.0%
Manufacture of other inorganic basic chemicals	0.0%
Manufacture of plastics in primary form	0.0%
Manufacture of other organic basic chemicals	0.0%
<b>Electricity, gas, steam and air conditioning supply</b>	
Production of electricity from solar PV	2.1%
Production of electricity from hydropower	0.0%
Transmission and distribution of electricity	0.0%
Production of electricity from gas combustion	0.0%
Storage of energy	0.0%
Manufacture of biomass, biogas or biofuels	0.0%
Production of electricity from wind power	0.0%
Production of electricity from bioenergy	0.0%
Production of electricity from geothermal	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>0.00%</b>
<b>TOTAL ALIGNMENT</b>	<b>10.6%</b>

● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no specific target exposure, 8.5% of the Fund’s investments were in transitional and enabling activities at 31 December 2022:

1. Total Taxonomy Aligned Investments	10.6%
<u>1.1 Total transitional activities</u>	0.0%
1.1.1 Of which contributes to climate mitigation transitional activities	0.0%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	8.5%
1.1.1 Of which contributes to climate mitigation enabling activities	8.5%
1.1.2 Of which contributes to climate adaptation enabling activities	0.0%

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A. This is the first reporting period.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

N/A. The Fund does not have sustainable investments.



**What was the share of socially sustainable investments?**

N/A. The Fund does not have sustainable investments.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

Only Cash was included under “Other”.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

During the year, the Investment Manager engaged with 9 companies held in the Fund in respect of the following:

- Climate: 1
- Environment: 2
- Social: 1
- Governance: 5



As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.

**How did this financial product perform compared to the reference benchmark?**

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

- ***How does the reference benchmark differ from a broad market index?***

N/A

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

N/A

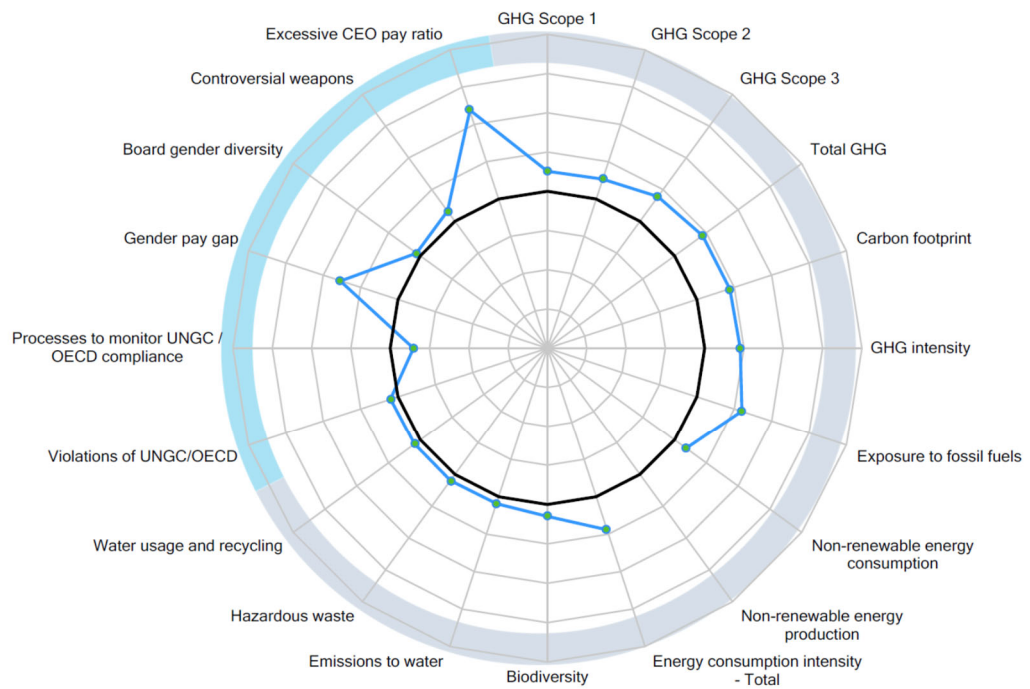
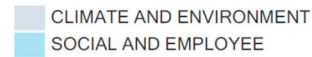
- **How did this financial product perform compared with the reference benchmark?**

N/A

- **How did this financial product perform compared with the broad market index?**

The benchmark of the Fund is the MSCI World SMID Cap (Total Return) index.

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the benchmark (black line) across 20 Principal Adverse Impact indicators. When the blue line sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to its benchmark, the MSCI World SMID Cap (Total Return) index, as at 31 December 2022:

## Montanaro Global Innovation

PAI MEASURES					
	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	10	30%	1,230	56%
GHG Scope 2	scope 2 GHG emissions	40	19%	420	49%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	1,120	0%	9,080	9%
Total GHG	total GHG emissions	1,170	0%	10,730	8%
Carbon footprint	carbon footprint	104.73	0%	963.91	8%
GHG intensity	ghg intensity of investee companies	787.64	0%	1,519.51	8%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	0.00%	100%	9.00%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	71.73%	5%	73.53%	7%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	66.96%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.06	7%	0.81	15%
Energy consumption intensity - NACE Sector A	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	1.53	6%
Energy consumption intensity - NACE Sector B	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	N/A	N/A	1.24	3%
Energy consumption intensity - NACE Sector C	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.13	5%	0.67	21%
Energy consumption intensity - NACE Sector D	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	N/A	N/A	7.70	7%
Energy consumption intensity - NACE Sector E	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	N/A	N/A	0.74	10%
Energy consumption intensity - NACE Sector F	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	N/A	N/A	0.15	19%
Energy consumption intensity - NACE Sector G	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	N/A	N/A	0.72	11%
Energy consumption intensity - NACE Sector H	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	N/A	N/A	1.58	10%
Energy consumption intensity - NACE Sector L	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	N/A	N/A	0.31	29%

	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity -sensitive areas where activities of those investee companies negatively affect those areas	0.00%	0%	2.27%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	3.60	0%	3,265.36	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.07	7%	27.42	7%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	294.37	0%	65,805.50	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.27%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	83.08%	100%	77.33%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	85.77%	0%	83.94%	0%
Board gender diversity	average ratio of female to male board members in investee companies	27.31%	73%	26.82%	93%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	0.57%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	29.91	0%	60.90	0%



## ANNEX V

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:** Montanaro Better World Fund

**Legal entity identifier:** 635400INKQVF8Y5I5P87

## Sustainable investment objective

Did this financial product have a sustainable investment objective?



Yes



It made **sustainable investments with an environmental objective**: 37.4%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It made **sustainable investments with a social objective**: 60.9%



No



It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promoted E/S characteristics, but **did not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**To what extent was the sustainable investment objective of this financial product met?**

The Fund's Sustainability Objective is as follows:

*The Fund will seek to invest in high quality companies whose products, services or behaviour are deemed to make a positive impact on society and which emphasise sound environmental, social and governance (ESG) practices. Through the Fund's investments, the Investment Manager seeks to improve access to, and quality of, basic life essentials, reduce inequality, and mitigate the effects of climate change.*



**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

In practice, and to contribute to the Sustainable Investment Objective, the Fund invests in small and midcap companies which have at least 50% of their revenues aligned with one or more of the six themes below:

1. **Environmental Protection** (including pollution control; water treatment; waste recycling and management; testing, inspection & certification);
2. **Green Economy** (including renewable energies; smart infrastructure; energy transition technologies and efficient transportation);
3. **Healthcare** (including treatment of illnesses and diseases; medical innovation; affordable healthcare and prevention);
4. **Innovative Technologies** (including manufacturing efficiencies; smart robots & artificial intelligence; connectivity and cyber-security);
5. **Nutrition** (including efficient food production, sustainable food distribution; healthy eating and food security);
6. **Wellbeing** (including addressing the challenges of population ageing; active lifestyles, education and security & safety).

(together the “Sustainability Themes”)

These Sustainability Themes were chosen because they directly support 14 of the United Nations’ 17 Sustainable Development Goals (“SDGs”), namely:

- GOAL 2: Zero Hunger
- GOAL 3: Good Health and Well-being
- GOAL 4: Quality Education
- GOAL 5: Gender Equality
- GOAL 6: Clean Water and Sanitation
- GOAL 7: Affordable and Clean Energy
- GOAL 8: Decent Work and Economic Growth
- GOAL 9: Industry, Innovation and Infrastructure
- GOAL 10: Reduced Inequality
- GOAL 11: Sustainable Cities and Communities
- GOAL 12: Responsible Consumption and Production
- GOAL 13: Climate Action
- GOAL 14: Life below Water
- GOAL 15: Life on Land

Three Goals are not targeted directly by the Fund. These are:

- GOAL 1: No Poverty
- GOAL 16: Peace, Justice and Strong Institutions
- GOAL 17: Partnerships for the Goals

As at 31 December 2022, 96.4% of weighted average revenues in the Fund were aligned with at least one of the six Sustainability Themes.

● **How did the sustainability indicators perform?**

The Investment Manager uses the following indicators to measure the attainment of the sustainable investment objective of the Fund:

- (i) Percentage of investee companies' revenue alignment with the targets which underpin the SDGs. The minimum required for a company to be eligible for investment (both new and ongoing) by the Fund is 50%.
- (ii) Carbon intensity of the Fund (Scope 1 + 2) relative to its Benchmark;
- (iii) Percentage of investee companies which have credible Net Zero Carbon strategies;
- (iv) Percentage of women on boards of investee companies;
- (v) Percentage of independent directors on boards of investee companies;
- (vi) Percentage of companies which have an anti-bribery policy.

As at 31 December 2022, these indicators were as follows for the Fund as a whole:

- (i) **Percentage of investee companies' revenue aligned: 96.4%**
- (ii) **Carbon intensity (Scope 1 + 2):**
  - a. Fund: 26.9 tons of CO<sub>2</sub>e / \$1m of Sales
  - b. Benchmark: 199.6 tons of CO<sub>2</sub>e / \$1m of Sales
- (iii) **Percentage of investee companies with credible Net Zero Carbon strategies: 24%**
- (iv) **Percentage of women on boards of investee companies: 29%**
- (v) **Percentage of independent directors on boards of investee companies: 77%**
- (vi) **Percentage of companies which have an anti-bribery policy: 86%**

Note: The benchmark is the Fund's official benchmark, i.e. the MSCI World SMID Cap (Total Return) Index.

The data above is sourced from MSCI and / or Bloomberg and updated on a quarterly basis. Where the indicators differ from expectations, the indicator will be investigated.

In addition to the above, the Investment Manager monitors the Fund's overall exposure to the Sustainable Development Goals. According to Impact Cubed, the exposure was as follows:

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

1 NO POVERTY		CARBON EFFICIENCY, GENDER EQUALITY, ENVIRONMENTAL GOOD, SOCIAL GOOD, ECONOMIC DEVELOPMENT, EMPLOYMENT
2 ZERO HUNGER		TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, ECONOMIC DEVELOPMENT, EMPLOYMENT, AVOIDING WATER SCARCITY
3 GOOD HEALTH AND WELLBEING		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, GENDER EQUALITY, TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM, EMPLOYMENT, AVOIDING WATER SCARCITY
4 QUALITY EDUCATION		GENDER EQUALITY, TAX GAP, SOCIAL GOOD, EMPLOYMENT
5 GENDER EQUALITY		WATER EFFICIENCY, GENDER EQUALITY, EXECUTIVE PAY, ECONOMIC DEVELOPMENT, AVOIDING WATER SCARCITY
6 CLEAN WATER AND SANITATION		WASTE EFFICIENCY, WATER EFFICIENCY, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM, AVOIDING WATER SCARCITY
7 AFFORDABLE AND CLEAN ENERGY		CARBON EFFICIENCY, ENVIRONMENTAL GOOD, AVOIDING ENVIRONMENTAL HARM
8 DECENT WORK AND ECONOMIC GROWTH		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, EXECUTIVE PAY, BOARD INDEPENDENCE, TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, ECONOMIC DEVELOPMENT, EMPLOYMENT, AVOIDING WATER SCARCITY
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM, ECONOMIC DEVELOPMENT, AVOIDING WATER SCARCITY
10 REDUCED INEQUALITIES		GENDER EQUALITY, EXECUTIVE PAY, BOARD INDEPENDENCE, TAX GAP, ECONOMIC DEVELOPMENT, EMPLOYMENT, AVOIDING WATER SCARCITY
11 SUSTAINABLE CITIES AND COMMUNITIES		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM, ECONOMIC DEVELOPMENT, EMPLOYMENT, AVOIDING WATER SCARCITY
12 RESPONSIBLE CONSUMPTION AND PRODUCTION		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM
13 CLIMATE ACTION		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, ENVIRONMENTAL GOOD, AVOIDING ENVIRONMENTAL HARM, ECONOMIC DEVELOPMENT, AVOIDING WATER SCARCITY
14 LIFE BELOW WATER		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, ENVIRONMENTAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING WATER SCARCITY
15 LIFE ON LAND		CARBON EFFICIENCY, WASTE EFFICIENCY, WATER EFFICIENCY, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING WATER SCARCITY
16 PEACE, JUSTICE AND STRONG INSTITUTIONS		GENDER EQUALITY, EXECUTIVE PAY, BOARD INDEPENDENCE, TAX GAP, ENVIRONMENTAL GOOD, SOCIAL GOOD, AVOIDING ENVIRONMENTAL HARM, AVOIDING SOCIAL HARM, ECONOMIC DEVELOPMENT, EMPLOYMENT
17 PARTNERSHIPS FOR THE GOALS		GENDER EQUALITY, EXECUTIVE PAY, TAX GAP, ECONOMIC DEVELOPMENT

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1

● **...and compared to previous periods?**

N/A. 2022 is the first reporting period under the SFDR regulation.

● **How did the sustainable investments not cause significant harm to any sustainable investment objective?**

In order to satisfy the ‘Do No Significant Harm’ principle, the Investment Manager reviews the following:

- 1) Ethical exclusions;

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others

- 2) UNGC Violations;
- 3) Controversies;
- 4) Principal Adverse Indicators (PAIs).

Ethical Exclusions:

The Fund invests exclusively in Sustainable investments as defined by the Investment Manager. In addition, the Fund does not invest in companies with more than 10% revenue exposure to:

- Tobacco;
- Alcohol;
- Manufacturing or supply of weapons;
- Pornography;
- Gambling;
- High-interest Rate Lending;
- Fossil Fuels; and
- Animal Testing (except for human healthcare purposes).

The data used to monitor the Fund’s exposure to these exclusions is sourced from the investee companies, MSCI and Bloomberg.

The Fund fully complied with all of these exclusions during the year.

UNGC Violations:

The Fund’s exposure to UNGC violations is monitored based on data received from MSCI. During the year, the Fund had no holdings with UNGC violations.

Severe Controversies:

The Fund’s exposure to Severe Controversies is monitored based on data received from MSCI. During the year, the Fund had no holdings with Severe or Very Severe Controversies.

Principal Adverse Indicators:

The Investment Manager collects and monitors the PAI data on individual holdings in the Fund. The data is reviewed to ensure that the ‘Do No Significant Harm’ principle is adhered to for each holding.

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers 10 of the 14 PAIs at Portfolio level:

- Scope 1 GHG emissions;
- Scope 2 GHG emissions;

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others

- Scope 3 GHG emissions;
- Total GHG emissions;
- Carbon footprint;
- GHG intensity of investee companies;
- Share of investments in companies active in the fossil fuel sector;
- Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
- Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
- Share of investments in investee companies involved in the manufacture or selling of controversial weapons.

These Portfolio-level PAIs are reported at the end of this document.

In addition to the Portfolio-level PAIs, the Investment Manager reviews the internal ESG Checklists of each of the Fund’s holdings on an ongoing basis (i.e. quarterly at a minimum). These Checklists have three sections (Environmental, Social and Governance) scored separately which are incorporated into a total score out of 10. Any significant change in a company’s score – whether per section or in aggregate – will result in further investigation and possible engagement with the company.

During the year, the Investment Manager engaged with 22 companies held in the Fund in respect of the following:

- Climate: 8
- Environment: 5
- Social: 3
- Governance: 6

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>

— *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Impact Cubed performed an assessment of the Fund and, based on its findings, it was determined that there were no violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.



**How did this financial product consider principal adverse impacts on sustainability factors?**

As part of its investment process (both pre-investment and on an ongoing basis), the Investment Manager considers the 14 mandatory PAIs and 2 additional PAIs:

1. GHG emissions (Scope 1, 2 and 3 emissions; and total GHG emissions);
2. Carbon footprint;
3. GHG intensity of investee companies;

4. Share of investments in companies active in the fossil fuel sector;
5. Share of non-renewable energy consumption and production;
6. Energy consumption intensity per high impact climate sector;
7. Biodiversity;
8. Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average;
9. Hazardous Waste;
10. Violations of UN Compact principles and OECD Guidelines for Multinational Enterprises;
11. Lack of processes and compliance mechanisms to monitor compliance with UN Compact principles and OECD Guidelines for Multinational Enterprises;
12. Gender pay gap;
13. Average ratio of female to male board members in investee companies, expressed as a percentage of all board members;
14. Share of investments in investee companies involved in the manufacture or selling of controversial weapons;
15. Water usage and recycling;
16. Excessive CEO pay ratio.

The Investment Manager meets with the companies in which it invests on a regular basis. A decision to actively engage typically arises from any of the following:

- the company fares badly (relative to its sector or other companies in the Fund) on any of the PAIs considered by the Fund;
- the Investment Manager's proprietary ESG or Impact Checklists have flagged a weakness at the company;
- the Investment Manager's proprietary ESG Checklist has a score of 5 or below;
- the Investment Manager disagrees with one or several resolutions proposed at the company's forthcoming General Meeting;
- a sustainability-related controversy has emerged on the company.

During the year, the Investment Manager engaged with 22 companies held in the Fund in respect of the following:

- Climate: 8
- Environment: 5
- Social: 3
- Governance: 6

A progress report on our engagement with investee companies on their journey towards Net Zero is available here: <https://montanaro.co.uk/deep-dive/net-zero-carbon-2022/>



### **What were the top investments of this financial product?**

**Asset allocation**  
describes the share  
of investments in  
specific assets.

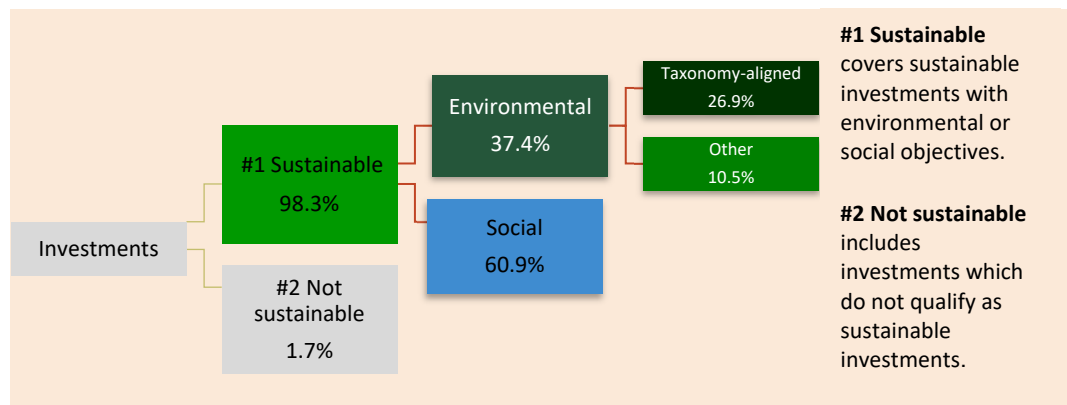
Largest investments	Sector	% Assets	Country
ANSYS INC	Information Technology	3.3%	United States of America
BRUKER CORP	Health Care	3.2%	United States of America
CHR HANSEN HOLDING A/S	Materials	3.0%	Denmark
IDEX CORP	Industrials	3.0%	United States of America
PRO MEDICUS LTD	Health Care	2.9%	Australia
TERNA ENERGY SA	Utilities	2.8%	Greece
TECAN GROUP AG-REG	Health Care	2.7%	Switzerland
ICON PLC	Health Care	2.7%	United States of America
BIO-TECHNE CORP	Health Care	2.7%	United States of America
SARTORIUS STEDIM BIOTECH	Health Care	2.6%	France
TREX COMPANY INC	Industrials	2.6%	United States of America
IDP EDUCATION LTD	Consumer Discretionary	2.6%	Australia
NOVA LTD	Information Technology	2.5%	United States of America
MSCI INC	Financials	2.5%	United States of America
VEEVA SYSTEMS INC-CLASS A	Health Care	2.5%	United States of America



## What was the proportion of sustainability-related investments?

### What was the asset allocation?

Please see chart below, which outlines the asset allocation within the Fund as at 31 December 2022.



With the exception of Cash, which accounted for 1.7% of the Fund's Net Asset Value at 31 December 2022, all investments qualified as "#1 Sustainable".

### In which economic sectors were the investments made?

As at 31 December 2022, the breakdown of investments by economic sector was as follows:

Energy	0.0%
Materials	5.7%
Industrials	23.0%
Consumer Discretionary	5.6%

Consumer Staples	0.0%
Health Care	30.6%
Financials	2.5%
Information Technology	25.8%
Communication Services	0.0%
Utilities	5.2%
Real Estate	0.0%
CASH	1.7%



### To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?

Although the Fund has set a minimum of 0% alignment with EU Taxonomy-aligned activities, in practice it had 26.9% alignment (based on Turnover) at 31 December 2022, according to data from Impact Cubed.

#### Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?



Yes:



In fossil gas



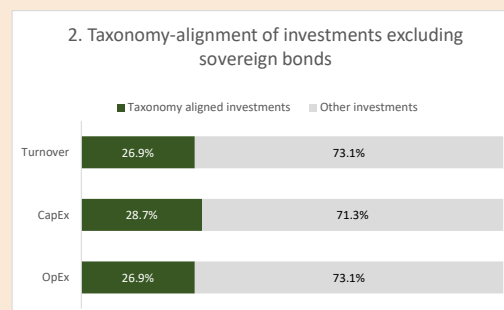
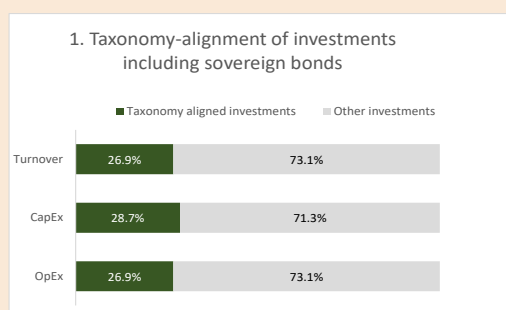
In nuclear energy



No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures



As at 31 December 2022, the Fund's 26.9% alignment (by Turnover) with the EU Taxonomy by economic activity was as follows (data sourced from Impact Cubed):

<b>Climate Change Mitigation - TOTAL</b>	<b>26.9%</b>
<b>Manufacturing</b>	
Manufacture of low carbon technologies	19.5%
Manufacture of other organic basic chemicals	1.9%
Manufacture of aluminium	0.0%
Manufacture of iron and steel	0.0%
Manufacture of cement	0.0%
Manufacture of fertilizers and nitrogen compounds	0.0%
Manufacture of other inorganic basic chemicals	0.0%
Manufacture of plastics in primary form	0.0%
<b>Electricity, gas, steam and air conditioning supply</b>	
Production of electricity from wind power	2.5%
Storage of energy	0.1%
Transmission and distribution of electricity	0.7%
Production of electricity from solar PV	1.6%
Production of electricity from hydropower	0.0%
Production of electricity from gas combustion	0.0%
Manufacture of biomass, biogas or biofuels	0.0%
Production of electricity from bioenergy	0.0%
Production of electricity from geothermal	0.0%
<b>Transportation and storage</b>	
Infrastructure for low carbon transport	0.6%
Freight rail transport	0.0%
Public transport	0.0%
Passenger rail transport (inter-urban)	0.0%
Construction of water projects	0.0%
Passenger cars and commercial vehicles	0.0%
<b>Water, sewerage, waste and remediation</b>	
Water collection, treatment and supply	0.0%
Material recovery from waste	0.0%
<b>Climate Change Adaptation - TOTAL</b>	<b>0.0%</b>
<b>TOTAL ALIGNMENT</b>	<b>26.9%</b>

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities are economic activities** for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.


● **What was the share of investments made in transitional and enabling activities?**

Although the Fund has no target exposure to transitional and enabling activities, 22.8% of the Fund’s investments were aligned with primary transitional and enabling activities.

1. Total Taxonomy Aligned Investments	26.9%
<u>1.1 Total transitional activities</u>	1.9%
1.1.1 Of which contributes to climate mitigation transitional activities	1.9%
1.1.2 Of which contributes to climate adaptation transitional activities	0.0%
<u>1.2 Total enabling activities</u>	20.9%
1.1.1 Of which contributes to climate mitigation enabling activities	20.9%
1.1.2 Of which contributes to climate adaptation enabling activities	0.0%

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

N/A. This is the first reporting period under the SFDR Regulation.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



**What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

As at 31 December 2022, 10.5% of the Fund’s investments had an environmental objective that was not aligned with the EU Taxonomy.



**What was the share of socially sustainable investments?**

As at 31 December 2022, 60.9% of the Fund’s investments qualified as socially sustainable.



**What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?**

All investments qualified as “sustainable”, either with an environmental or a social objective, with the exception of Cash. As at 31 December 2022, 1.7% of the Fund was held in Cash.



**What actions have been taken to attain the sustainable investment objective during the reference period?**

During the year, the Investment Manager engaged with 22 companies held in the Fund in respect of the following:

- Climate: 8
- Environment: 5
- Social: 3
- Governance: 6

As responsible shareholders we believe that it is our duty to engage with our investee companies where necessary. Active engagement can help to foster positive long-term change and improved societal and environmental outcomes. We will engage with companies where we become aware of any weakness or incident relating to our ESG policies or international norms. We also conduct thematic “Deep Dive” engagement projects on specific subjects to better understand how our companies are exposed to a particular issue or area of risk. An ongoing area of focus is climate change and achieving net zero emissions.



### How did this financial product perform compared to the reference sustainable benchmark?

N/A. No sustainable reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

- *How did the reference benchmark differ from a broad market index?*

N/A

- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?*

N/A

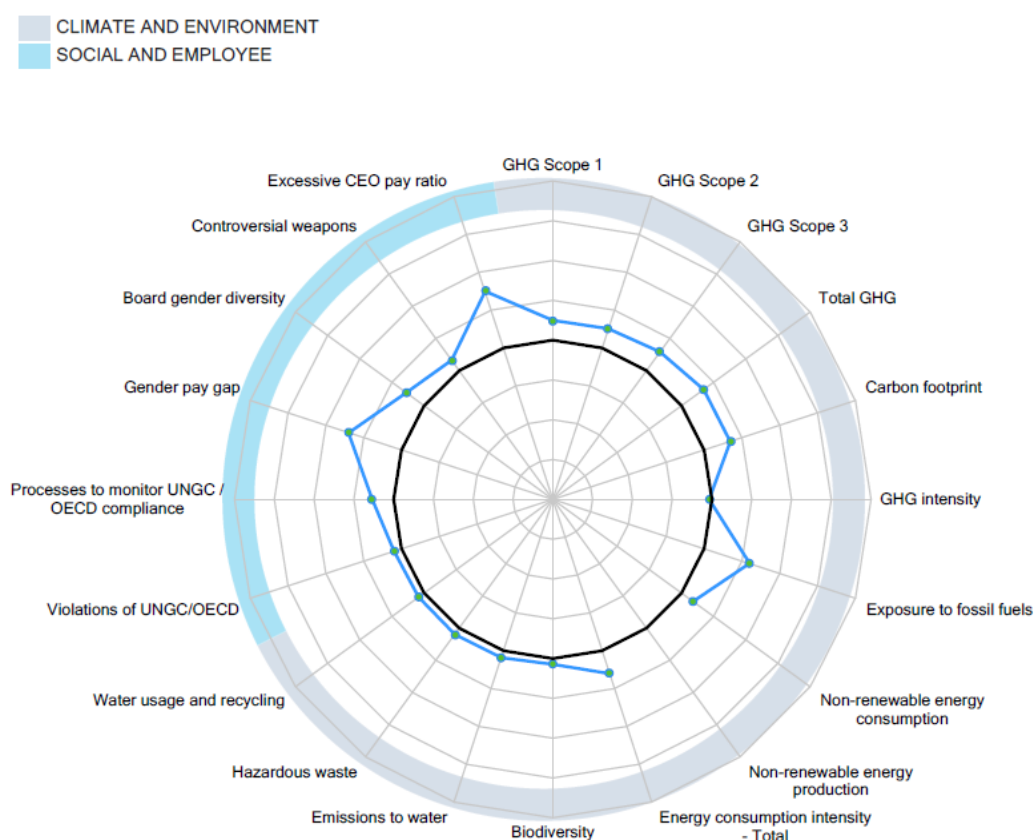
- *How did this financial product perform compared with the reference benchmark?*

N/A

- *How did this financial product perform compared with the broad market index?*

The benchmark of the Fund is the MSCI World SMID Cap (Total Return) index.

In the chart below (dated 31 December 2022), Impact Cubed compare the Fund (blue line) to the benchmark (black line) across 20 Principal Adverse Impact indicators. When the blue line sits above the black line it indicates that the Fund fares better than the benchmark on the particular indicator (and vice versa).



The table below highlights the PAI indicators of the Fund relative to its benchmark, the MSCI World SMID Cap (Total Return) index, as at 31 December 2022:

PAI MEASURES					
	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
GHG Scope 1	scope 1 GHG emissions	2,270	55%	68,390	56%
GHG Scope 2	scope 2 GHG emissions	2,880	45%	23,490	49%
GHG Scope 3	from 1 January 2023, Scope 3 GHG emissions	173,680	4%	503,980	9%
Total GHG	total GHG emissions	178,840	3%	595,870	8%
Carbon footprint	carbon footprint	289.30	3%	963.91	8%
GHG intensity	ghg intensity of investee companies	1,575.79	3%	1,519.51	8%
Exposure to fossil fuels	share of investments in companies active in the fossil fuel sector	0.00%	100%	9.00%	100%
Non-renewable energy consumption	share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	71.76%	10%	73.53%	7%
Non-renewable energy production	share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	N/A	N/A	66.96%	100%
Energy consumption intensity - Total	energy consumption in GWh per million EUR of revenue of investee companies - Total	0.30	19%	0.81	15%
Energy consumption intensity - NACE Sector A	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector A (Agriculture, forestry and fishing)	N/A	N/A	1.53	6%
Energy consumption intensity - NACE Sector B	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector B (Mining and quarrying)	N/A	N/A	1.24	3%
Energy consumption intensity - NACE Sector C	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector C (Manufacturing)	0.33	32%	0.67	21%
Energy consumption intensity - NACE Sector D	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector D (Electricity, gas, steam and air conditioning supply)	N/A	N/A	7.70	7%
Energy consumption intensity - NACE Sector E	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector E (Water supply; sewerage; waste management and remediation activities)	0.36	0%	0.74	10%
Energy consumption intensity - NACE Sector F	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector F (Construction)	0.16	64%	0.15	19%
Energy consumption intensity - NACE Sector G	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector G (Wholesale and retail trade; repair of motor vehicles and motorcycles)	N/A	N/A	0.72	11%
Energy consumption intensity - NACE Sector H	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector H (Transporting and storage)	N/A	N/A	1.58	10%
Energy consumption intensity - NACE Sector L	energy consumption in GWh per million EUR of revenue of investee companies - NACE Sector L (Real estate activities)	N/A	N/A	0.31	29%

	Based on company reported	Fund	% fund disclosed	Benchmark	% benchmark disclosed
Biodiversity	share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	1.19%	0%	2.27%	0%
Emissions to water	tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	27.27	0%	3,265.36	0%
Hazardous waste	tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.36	17%	27.42	7%
Water usage and recycling	average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	2,848.56	0%	65,805.50	0%
Violations of UNGC/OECD	share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	100%	0.27%	100%
Processes to monitor UNGC / OECD compliance	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	72.08%	100%	77.33%	100%
Gender pay gap	average unadjusted gender pay gap of investee companies	85.61%	0%	83.94%	0%
Board gender diversity	average ratio of female to male board members in investee companies	29.11%	92%	26.82%	93%
Controversial weapons	share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	100%	0.57%	100%
Excessive CEO pay ratio	average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)	41.38	0%	60.90	0%