

BELGRAVIA LUX UCITS

Société d'investissement à capital variable

(a Luxembourg domiciled open-ended investment company with variable capital)

Annual report, including audited financial statements,
as at December 31, 2019

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BELGRAVIA LUX UCITS

Organisation of the SICAV

Registered office	15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg
Board of Directors of the SICAV	
Members	<p>Mr Miguel CEREZO JIMÉNEZ, Deputy Chairman, Belgravia Capital, SGIIC, S.A.</p> <p>Mrs Cristina SOLINÍS LACHAMBRE, Investor Relations Manager, Belgravia Capital, SGIIC, S.A.</p> <p>Mr Juan José MARTÍ ESCOLANO, Head of Risk Management and Normative Compliance Department, Belgravia Capital, SGIIC, S.A.</p> <p>Mr Javier VALLS, Independent Director, The Director's Office</p>
Management Company and Domiciliary Agent	FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg
Board of Directors of the Management Company	
Chairman	Mr Christian SCHRÖDER, Group Chief Digital Officer and Head of Organisation, Banque Pictet & Cie SA, 60, route des Acacias, CH-1211 Geneva 73, Switzerland
Members	<p>Mrs Michèle BERGER, CEO and Managing Director, FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg</p> <p>Mr Yves FRANCIS, Independent Director, 67, rue du Pannebourg, BE-6700 Arlon, Belgium (since April 3, 2019)</p> <p>Me Claude KREMER, Independent Director, Arendt & Medernach - Avocats, 41A, avenue J.F. Kennedy, L-2082 Luxembourg, Grand Duchy of Luxembourg (until April 2, 2019)</p> <p>Mr Geoffroy LINARD DE GUERTECHIN, Independent Director, 2, rue Jean-Pierre Beicht, L-1226 Luxembourg, Grand Duchy of Luxembourg</p>
Members of the Management Committee	<p>Mrs Michèle BERGER, CEO and Managing Director, FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg</p> <p>Mr Pascal CHAUVAUX, Head of Central Administration, FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg</p> <p>Mr Laurent DORLÉAC, Head of Risk & Compliance, FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg</p>

BELGRAVIA LUX UCITS

Organisation of the SICAV (continued)

Mr Dorian JACOB, Head of Investment Management Oversight, FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg

Investment Manager	Belgravia Capital, SGIIC, S.A., C/ Núñez de Balboa, 120, 4º dcha., 28006 - Madrid, Spain
Depository Bank	Pictet & Cie (Europe) S.A., 15A, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg
Administration Agent, Paying Agent and Registrar and Transfer Agent in Luxembourg	FundPartner Solutions (Europe) S.A., 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg
Independant Auditor	Ernst & Young S.A., 35E, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg
Legal Advisers as to matters of Luxembourg law	Elvinger Hoss Prussen, <i>société anonyme</i> , 2, place Winston Churchill, L-1340 Luxembourg, Grand Duchy of Luxembourg

BELGRAVIA LUX UCITS

General information

Financial periods of BELGRAVIA LUX UCITS (the "SICAV") end on December 31 in each year and the first financial period starts on the date of incorporation of the SICAV and ends on December 31, 2018. The annual report, including audited financial statements, expressed in EUR and with details of each sub-fund in the relevant base currency is made available at the SICAV's registered office, at least 8 days before the Annual General Meeting.

The unaudited semi-annual report dated as of June 30 of each year will be available at the SICAV's registered office, at the latest two months after the end of the period to which it relates. The first interim report prepared for the SICAV was dated as of June 30, 2019.

Copies of all reports are available at the registered offices of the SICAV.

A detailed schedule of changes in the composition of the securities portfolio over the year ended December 31, 2019 for the sub-fund is available free of charge upon request at the registered office of the SICAV.

Management report

MARKET SITUATION

In the first half of the year, European equities performed positively with a rise of 16.46% while BELGRAVIA LUX UCITS Epsilon depreciated by 1.86% as the fund's net market exposure remained low with an average beta of 0.04. The evolution of equities was marked by the FED announcement of a more dovish policy and the discount of a positive trade agreement between the US and China in its tariff dispute. On the other hand, business performance and company guidance, as well as macroeconomic data, did not reflect an improvement in the economy. By sector, those of growth (technology) and with visibility in profits (staples) stood out. On the other hand, those low-growth sectors such as the financial sector and the telecommunications sector had a worse evolution in relative terms.

In the second semester, during August, tension between US and China raised and tariffs increased on both sides, with a market correction of more than 6% from the July highs. The rest of the semester was marked by improved US-China relations, with the announcement of the "Phase One" trade agreement, greater visibility with respect to Brexit, as well as increased liquidity in the market thanks to lower rates and liquidity injections in the United States as well as a return to bond repurchase in Europe. At a sector level, there was no clearly defined behavior between income/growth and high/low quality, being the discretionary and financial sector those who raised the most.

In the foreign exchange market, the euro fell back by -1.95% as a result of lower economic growth in Europe, as well as uncertainty over Brexit. Oil has been volatile throughout the year as a result of geopolitical tensions and uncertainty about economic growth. However, it closed the year with a revaluation of 22.68%. Raw materials, with the exception of aluminum and zinc, performed positively throughout the year reflecting the improvement in US-China tariff talks.

Interest rate cuts and liquidity injections by FED along with ECB return to Quantitative Easing has had a positive impact on corporate fixed income prices during 2019.

During the fourth quarter, there were no changes in the investment strategy while keeping the portfolio's net exposure at reduced levels. The equity investment remained close to 25% with bias to companies of large capitalization and without a relevant exposure to a specific sector.

PERFORMANCE

BELGRAVIA LUX UCITS Epsilon investment universe is European equities. The investment objectives are to achieve positive returns and a Sharpe ratio higher than the Stoxx Europe 600 (Net Return) Index with a volatility of returns lower than the Stoxx Europe 600 (Net Return) Index. The company varies its equity exposure at its discretion, investing the balance in money market instruments.

During the year 2019, BELGRAVIA LUX UCITS Epsilon declined by 3.11% class R; 2.88% Class C and 2.84% Class I with an average beta of 0.02 in a positive environment for European equities as represented in the +26.82% seen in the Stoxx Europe 600 (Net Return) Index.

Management report (continued)

PORTFOLIO

As of December 31, 2019, the portfolio consists of a total of 36 securities that together represent a level of investment in shares of close to 30% of equity. During the fourth quarter, we have maintained bias towards high capitalization companies. In turn, we have rotated the portfolio slightly to "income" companies as a result of the expected rise in the return on longer-term bonds. 85% of the portfolio is invested in large-cap securities, with an average weight per position of 1% NAV, and 15% in small and medium-cap values with an average weight per position of 0.5% NAV.

Among the values that contributed positively to the portfolio during the last quarter are BNP, EDP, ING Mowi, Siemens and Siemens Gamesa. By sector we highlight the contribution of the health sector with the positive contributions of Bayer, Fagron, Fresenius, Philips and Siemens Healthineers.

Additions to the portfolio during the fourth quarter include: Atos, Bawag, Engie, Indra, Leonardo, Sbanken, Telefonica Deutschland, Thales and TF1.

Bearing in mind that:

- (i) Estimates corporate profits by 2020 are likely to be revised downwards due to lower economic growth and
- (ii) Valuation levels above historical average in Europe and the United States, BELGRAVIA LUX UCITS Epsilon is expected to keep its net investment grade close to current levels. With regard to the equity investment, is expected to increase from current levels and bias towards "income" companies with visibility in profits.

COVID 19:

On March 11, 2020, the World Health Organization elevated the public health emergency situation caused by COVID-19 to an international pandemic. The rapidity in the evolution of events and the extraordinary circumstances that occur constitute an unprecedented and enormous health crisis.

European and international authorities have taken measures and are evaluating additional economic stimulus measures in order to mitigate the social and economic impacts of this crisis.

This situation is affecting the international macroeconomic environment and the valuation of financial assets. At the date of preparation of these annual accounts, the directors of the SICAV consider that we are facing a conjunctural situation, without having identified situations that question the continuity of BELGRAVIA LUX UCITS Epsilon.

Established by the Investment Manager

Approved by the Board of Directors of the SICAV

March 2020

Independent auditor's report

To the Shareholders of
Belgravia LUX UCITS
15, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Opinion

We have audited the financial statements of Belgravia LUX UCITS (the "SICAV") which comprise the statement of net assets and the statement of investments and other net assets as at December 31, 2019, and the statement of operations and changes in net assets for the year then ended, and the notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the SICAV as at December 31, 2019, and of the results of their operations and changes in their net assets for the year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements.

Basis for Opinion

We conducted our audit in accordance with the Law of July 23, 2016 on the audit profession (the "Law of July 23, 2016") and with International Standards on Auditing ("ISAs") as adopted for Luxembourg by the "Commission de Surveillance du Secteur Financier" ("CSSF"). Our responsibilities under the Law of July 23, 2016 and ISAs are further described in the "responsibilities of the "réviseur d'entreprises agréé" for the audit of the financial statements" section of our report. We are also independent of the SICAV in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants ("IESBA Code") as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the financial statements, and have fulfilled our other ethical responsibilities under those ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other information

The Board of Directors of the SICAV is responsible for the other information. The other information comprises the information included in the annual report but does not include the financial statements and our report of the "réviseur d'entreprises agréé" thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

Responsibilities of the Board of Directors of the SICAV for the financial statements

The Board of Directors of the SICAV is responsible for the preparation and fair presentation of these financial statements in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements, and for such internal control as the Board of Directors of the SICAV determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Board of Directors of the SICAV is responsible for assessing the SICAV'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 Board of Directors of the SICAV either intends to liquidate the SICAV or to cease operations, or has no realistic alternative but to do so.

Responsibilities of the "réviseur d'entreprises agréé" for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a report of the "réviseur d'entreprises agréé" that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Law of July 23, 2016 and with ISAs as adopted for Luxembourg by the CSSF 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.

As part of an audit in accordance with the Law of July 23, 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the SICAV's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors of the SICAV.
- Conclude on the appropriateness of the Board of Directors of the SICAV use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the SICAV's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report of the "réviseur d'entreprises agréé" to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our report of the "réviseur d'entreprises agréé". However, future events or conditions may cause the SICAV to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Ernst & Young
Société anonyme
Cabinet de révision agréé



Nicolas Bannier

Luxembourg, March 24, 2020

BELGRAVIA LUX UCITS

Statement of net assets as at December 31, 2019

BELGRAVIA LUX UCITS - EPSILON

EUR

ASSETS

Investments in securities at acquisition cost	2,772,697.46
Net unrealised gain on investments	175,747.63
Investments in securities at market value (note 2.b)	2,948,445.09
Cash at banks (note 2.b)	1,565,613.13
Bank deposits	5,590,000.00
Formation expenses (note 2.i)	22,986.33
	10,127,044.55

LIABILITIES

Management fees payable (note 5)	21,672.87
"Taxe d'abonnement" payable (note 3)	1,178.02
Other fees payable (note 10)	18,405.05
	41,255.94

TOTAL NET ASSETS AS AT DECEMBER 31, 2019 **10,085,788.61**

TOTAL NET ASSETS AS AT DECEMBER 31, 2018 **7,915,152.84**

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

BELGRAVIA LUX UCITS

Statement of operations and changes in net assets for the year ended December 31, 2019

BELGRAVIA LUX UCITS - EPSILON

EUR

NET ASSETS AT THE BEGINNING OF THE YEAR	7,915,152.84
INCOME	
Dividends, net (note 2.g)	58,537.14
	58,537.14
EXPENSES	
Amortization of formation expenses (note 2.i)	6,310.88
Management fees (note 5)	81,437.69
Depositary fees, bank charges and interest (note 8)	36,660.83
Professional fees, audit fees and other expenses (notes 4, 6)	76,454.87
Administration and domiciliary agent fees (note 9)	9,998.44
"Taxe d'abonnement" (note 3)	4,717.81
Transaction fees (note 2.h)	17,273.61
	232,854.13
NET INVESTMENT LOSS	-174,316.99
Net realised loss on sales of investments	-22,895.63
Net realised loss on foreign exchange	-222.75
Net realised loss on futures contracts	-420,682.86
NET REALISED LOSS	-618,118.23
Change in net unrealised appreciation:	
- on investments	295,974.09
DECREASE IN NET ASSETS AS A RESULT OF OPERATIONS	-322,144.14
Proceeds from subscriptions of shares	4,441,318.78
Cost of shares redeemed	-1,948,538.87
NET ASSETS AT THE END OF THE YEAR	10,085,788.61

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

BELGRAVIA LUX UCITS

Statistics

Sub-fund Class	Currency	Number of shares outstanding	Net asset value per share	Net asset value per share
		31.12.2019	31.12.2019	31.12.2018
BELGRAVIA LUX UCITS - EPSILON				
R	EUR	91,275.38	95.23	98.29
C	EUR	4,794.01	95.52	98.35
I	EUR	9,791.51	95.58	98.37

BELGRAVIA LUX UCITS - EPSILON

Statement of investments and other net assets as at December 31, 2019 (expressed in EUR)

Description	Currency	Quantity	Market value (note 2)	% of net assets
TRANSFERABLE SECURITIES ADMITTED TO AN OFFICIAL STOCK EXCHANGE LISTING OR DEALT IN ON ANOTHER REGULATED MARKET				
SHARES				
<i>AUSTRIA</i>				
BAWAG GROUP	EUR	1,400.00	56,840.00	0.56
			56,840.00	0.56
<i>BELGIUM</i>				
FAGRON	EUR	2,592.00	50,103.36	0.50
SOLVAY	EUR	400.00	41,320.00	0.41
			91,423.36	0.91
<i>FRANCE</i>				
ALBIOMA	EUR	1,700.00	44,200.00	0.44
ATOS	EUR	760.00	56,483.20	0.56
BNP PARIBAS 'A'	EUR	400.00	21,132.00	0.21
CARREFOUR	EUR	10,200.00	152,490.00	1.50
DANONE	EUR	1,700.00	125,630.00	1.25
ENGIE	EUR	3,700.00	53,280.00	0.53
ESSILORLUXOTTICA	EUR	800.00	108,640.00	1.08
SCOR	EUR	1,450.00	54,259.00	0.54
TF1	EUR	17,000.00	125,800.00	1.25
THALES	EUR	850.00	78,642.00	0.78
VIVENDI	EUR	2,900.00	74,878.00	0.74
			895,434.20	8.88
<i>GERMANY</i>				
BAYER REG.	EUR	850.00	61,888.50	0.61
FRESENIUS	EUR	1,800.00	90,324.00	0.90
MERCK	EUR	1,000.00	105,350.00	1.04
SIEMENS	EUR	565.00	65,845.10	0.65
TELEFONICA DEUTSCHLAND HOLDING	EUR	39,000.00	100,776.00	1.00
			424,183.60	4.20
<i>ITALY</i>				
AVIO	EUR	2,300.00	31,878.00	0.32
ENI	EUR	7,600.00	105,229.60	1.04
LEONARDO	EUR	9,500.00	99,275.00	0.98
			236,382.60	2.34
<i>LIBERIA</i>				
ROYAL CARIBBEAN CRUISES	USD	260.00	30,924.36	0.31
			30,924.36	0.31

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

BELGRAVIA LUX UCITS - EPSILON

Statement of investments and other net assets as at December 31, 2019 (expressed in EUR) (continued)

Description	Currency	Quantity	Market value (note 2)	% of net assets
<i>NETHERLANDS</i>				
HEINEKEN	EUR	1,100.00	104,412.00	1.04
ING GROUP	EUR	3,600.00	38,476.80	0.38
NN GROUP	EUR	1,300.00	43,966.00	0.44
ROYAL PHILIPS	EUR	2,550.00	110,976.00	1.10
			297,830.80	2.96
<i>NORWAY</i>				
MOWI	NOK	4,000.00	92,540.91	0.92
SBANKEN ASA	NOK	7,800.00	58,991.79	0.58
			151,532.70	1.50
<i>PORTUGAL</i>				
EDP - ENERGIAS DE PORTUGAL	EUR	58,900.00	227,589.60	2.25
			227,589.60	2.25
<i>SPAIN</i>				
INDRA SISTEMAS	EUR	5,400.00	54,972.00	0.55
SIEMENS GAMESA RENEWABLE ENERGY	EUR	3,400.00	53,159.00	0.53
TELEFONICA	EUR	23,500.00	146,334.50	1.45
			254,465.50	2.53
<i>UNITED KINGDOM</i>				
CONVATEC GROUP	GBP	14,500.00	33,959.92	0.34
RECKITT BENCKISER GROUP	GBP	1,200.00	86,799.73	0.86
VODAFONE GROUP	GBP	93,000.00	161,078.72	1.59
			281,838.37	2.79
TOTAL INVESTMENTS			2,948,445.09	29.23
CASH AT BANKS			1,565,613.13	15.52
BANK DEPOSITS			5,590,000.00	55.42
OTHER NET LIABILITIES			-18,269.61	-0.17
TOTAL NET ASSETS			10,085,788.61	100.00

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

BELGRAVIA LUX UCITS - EPSILON

Geographical and industrial classification of investments as at December 31, 2019

Geographical classification

(in % of net assets)

France	8.88
Germany	4.20
Netherlands	2.96
United Kingdom	2.79
Spain	2.53
Italy	2.34
Portugal	2.25
Norway	1.50
Belgium	0.91
Austria	0.56
Liberia	0.31
	29.23

Industrial classification

(in % of net assets)

Communications	6.03
Electronics and electrical equipment	4.05
Public utilities	2.78
Pharmaceuticals and cosmetics	1.94
Banks and credit institutions	1.73
Retail and supermarkets	1.50
Food and soft drinks	1.25
Photography and optics	1.08
Oil and gas	1.04
Tobacco and alcohol	1.04
Chemicals	1.02
Insurance	0.98
Aeronautics and astronautics	0.98
Agriculture and fisheries	0.92
Miscellaneous trade	0.86
Computer and office equipment	0.56
Healthcare & social services	0.50
Utilities	0.34
Holding and finance companies	0.32
Gastronomy	0.31
	29.23

BELGRAVIA LUX UCITS

Notes to the financial statements as at December 31, 2019

NOTE 1

GENERAL

BELGRAVIA LUX UCITS (the "SICAV") is an umbrella investment company with variable capital (*société d'investissement à capital variable*) incorporated under the form of a *société anonyme* in the Grand Duchy of Luxembourg. It qualifies as an undertaking for collective investment in transferable securities ("UCITS"), incorporated on June 27, 2018, and authorised under Part I of the law of December 17, 2010 relating to undertakings for collective investment ("UCI"), as amended (the "Law").

The SICAV is registered with the *Registre de Commerce et des Sociétés*, Luxembourg (Luxembourg register of commerce and companies) under number B225846.

The Articles of Incorporation are deposited with the *Registre de Commerce et des Sociétés*, Luxembourg and have been published in the *Recueil électronique des sociétés et associations* ("RESA") on July 10, 2018.

There is no limit to the number of Shares which may be issued. Shares are only issued in registered form and ownership of shares is evidenced by entry in the Register. No temporary documents of title or share certificates is issued.

FundPartner Solutions (Europe) S.A. with registered office at 15, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg was appointed Management Company of the SICAV as of June 27, 2018. It is a management company within the meaning of chapter 15 of the Law.

a) Sub-funds in activity

As at December 31, 2019, the SICAV includes the following sub-fund:

- BELGRAVIA LUX UCITS - EPSILON, denominated in Euro (EUR).

b) Significant events and material changes

A new prospectus came into force in December 2019.

c) Share classes

As at December 31, 2019, the following share classes are issued:

BELGRAVIA LUX UCITS - EPSILON:

- R
- C
- I

Notes to the financial statements as at December 31, 2019 (continued)

NOTE 2

SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

a) Preparation and presentation of financial statements

The financial statements are prepared in accordance with generally accepted accounting principles and presented in accordance with the legal reporting requirements applicable in Luxembourg relating to UCIs.

The reference currency of the SICAV is the EUR.

b) Valuation of assets

The assets of the SICAV are valued in accordance with the following principles:

- 1) Shares or units in open-ended undertakings for collective investment, which do not have a price quotation on a Regulated Market, are valued at the actual net asset value for such shares or units as of the relevant Valuation Day, failing which they shall be valued at the last available net asset value which is calculated prior to such Valuation Day. In the case where events have occurred which have resulted in a material change in the net asset value of such shares or units since the last net asset value was calculated, the value of such shares or units may be adjusted at their fair value in order to reflect, in the reasonable opinion of the Directors, such change;
- 2) The value of securities (including a share or unit in a closed-ended undertaking for collective investment and in an exchange traded fund) and/or financial derivative instruments which are listed and with a price quoted on any official stock exchange or traded on any other organised market at the closing price. Where such securities or other assets are quoted or dealt in or on more than one stock exchange or other organised markets, the Directors shall select the principal of such stock exchanges or markets for such purposes;
- 3) Shares or units in undertakings for collective investment the issue or redemption of which is restricted and in respect of which a secondary market is maintained by dealers who, as principal market-makers, offer prices in response to market conditions may be valued by the Directors in line with such prices;
- 4) The value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued as aforesaid and not yet received shall be deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof shall be arrived at after making such discount as the Directors may consider appropriate in such case to reflect the true value thereof;
- 5) The value of any security or other asset which is dealt principally on a market made among professional dealers and institutional investors shall be determined by reference to the last available price;
- 6) Any assets or liabilities in currencies other than the relevant currency of the sub-fund concerned are converted using the relevant spot rate quoted by a bank or other responsible financial institution;

Notes to the financial statements as at December 31, 2019 (continued)

7) In the event that any of the securities held in the SICAV portfolio on the relevant day are not listed on any stock exchange or traded on any organised market or if with respect to securities listed on any stock exchange or traded on any other organised market, the price as determined pursuant to sub-paragraph (2) is not, in the opinion of the Directors, representative of the fair market value of the relevant securities, the value of such securities is determined prudently and in good faith based on the reasonably foreseeable sales price or any other appropriate valuation principles;

8) Liquid assets and Money Market Instruments may be valued at nominal value plus any accrued interest or an amortised cost basis. All other assets, where practice allows, may be valued in the same manner. If the method of valuation on an amortised cost basis is used, the portfolio holdings are reviewed from time to time under the direction of the Directors to determine whether a deviation exists between the net asset value calculated using market quotations and that calculated on an amortised cost basis. If a deviation exists which may result in a material dilution or other unfair result to investors or existing shareholders, appropriate corrective action is taken including, if necessary, the calculation of the net asset value by using available market quotations;

9) In the event that the above mentioned calculation methods are inappropriate or misleading, the Directors may adopt to the extent such valuation principles are in the best interests of the shareholders any other appropriate valuation principles for the assets of the SICAV;

10) In circumstances where the interests of the SICAV or its shareholders so justify (avoidance of market timing practices, for example), the Directors may take any appropriate measures, such as applying a fair value pricing methodology to adjust the value of the SICAV's assets;

c) Net realised gain/loss on sales of investments

The net realised gain/loss on sales of investments is calculated on the basis of the weighted average cost of the investments sold.

d) Cost of investment securities

The cost of investment securities in currencies other than the currency of the SICAV is translated into the currency of the sub-fund at the exchange rate applicable at purchase date.

e) Valuation of futures contracts

Open futures contracts are valued at the last settlement or close price on the stock exchanges or regulated markets.

f) Accounting of futures contracts

Change in net unrealised appreciation/depreciation on futures contracts, and net realised gains or losses on futures contracts are disclosed in the statement of operations and changes in net assets. Unrealised gains and/or losses already settled through the receipt/payment of a cash amount are kept as change in net unrealised appreciation/depreciation on futures contracts in the statement of operations and other changes in net assets until the termination of the futures contract.

BELGRAVIA LUX UCITS

Notes to the financial statements as at December 31, 2019 (continued)

g) Income

Dividends are recorded net of withholding tax at the ex-dividend date. Interest is recorded on an accrual basis.

h) Transaction fees

The transaction fees represent the costs incurred by the SICAV in connection with purchases and sales of investments. They include brokerage fees as well as bank commissions, tax, depositary fees and other transaction fees, and are included in the statement of operations and change in net assets.

i) Formation expenses

Formation expenses are amortised over a period not exceeding 5 years.

NOTE 3

TAXE D'ABONNEMENT

In accordance with Luxembourg legislation currently in force (which, is therefore, subject to any future changes), the SICAV is not subject to any tax on income, profits, gains or wealth tax. Moreover, save for cases covered under "EU Tax Considerations" below, no dividends distributed by the SICAV are subject to withholding tax.

The SICAV's net assets are subject to a subscription tax ("taxe d'abonnement") of 0.05% per annum payable at the end of each calendar quarter and calculated on the basis of the SICAV's total net assets at the end of the relevant quarter; such tax is reduced to 0.01% per annum in respect of Classes comprising institutional investors only (as per article 174 of the Law), as well as in respect of liquidity funds. This tax is not applicable for the portion of the assets of a sub-fund invested in other Luxembourg undertakings for collective investment already subject to *taxe d'abonnement*.

Interest and dividend income received by the SICAV may be subject to non-recoverable withholding tax in the countries of origin. The SICAV may further be subject to tax on the realised or unrealised capital appreciation of its assets in the countries of origin.

No stamp duty or other tax is payable in Luxembourg on the issue of Shares in the SICAV.

NOTE 4

MANAGEMENT COMPANY FEES

The Management Company fees do not exceed 0.05% per annum on the total net assets.

The Management Company fees accrue daily and are paid quarterly in arrears. The fees payable are subject to a minimum of EUR 10,000 p.a. per sub-fund during the second year and a minimum of EUR 20,000 p.a. per sub-fund during the third and following years.

Management Company fees are recorded under the caption "Professional fees, audit fees and other expenses" in the statement of operations and changes in net assets.

BELGRAVIA LUX UCITS

Notes to the financial statements as at December 31, 2019 (continued)

NOTE 5 MANAGEMENT FEES

In consideration for the investment management services provided to the SICAV, the Investment Manager is entitled to receive from the SICAV management fees of a percentage of the net assets of the relevant Class, accrued on each Valuation Day and payable quarterly in arrears as follows:

Sub-fund	Share class	Management fees
BELGRAVIA LUX UCITS - EPSILON	R	up to 1.25%
	C	up to 1.00%
	I	up to 1.00%

NOTE 6 DIRECTOR FEES

BELGRAVIA LUX UCITS pays Director fees to one member of its Board of Directors of the SICAV, Mr Javier Valls. The yearly fee is EUR 12,000.00 gross.

Director's fees are disclosed in the statement of operations and changes in net assets under the caption "Professional fees, audit fees and other expenses".

NOTE 7 PERFORMANCE FEES

The Investment Manager receives performance fees, accrued on each Valuation Day, paid annually, based on the Net Asset Value ("NAV"), equivalent to 9% of the performance of the NAV per share exceeding the high water mark.

The high water mark is defined as the greater of the following two figures:

- The last highest NAV per share on which a performance fee has been paid and;
- The initial NAV per share.

Further details on performance fees are available in the Prospectus of the SICAV.

No performance fee was paid by the sub-fund during the year ended December 31, 2019.

NOTE 8 DEPOSITARY FEES

As depositary bank, Pictet & Cie (Europe) S.A. is entitled to receive out of the assets of the SICAV, fees in consideration for providing services to it, along with such out-of-pocket expenses and disbursements as are deemed reasonable and customary by the Directors. The fees payable to Pictet & Cie (Europe) S.A., comprise transaction-based fees and asset-based fees. Such fees currently vary between 0.00% and 0.07% of the net asset value of each sub-fund (subject to a minimum of EUR 5,000 p.a. per sub-fund during the second year and a minimum of EUR 10,000 p.a. per sub-fund during the third and following years) depending on the market in which a particular sub-fund invests. The fees are accrued daily and are payable quarterly in arrears.

BELGRAVIA LUX UCITS

Notes to the financial statements as at December 31, 2019 (continued)

NOTE 9 ADMINISTRATION AND DOMICILIARY AGENT FEES

As Administration Agent and Domiciliary Agent, FundPartner Solutions (Europe) S.A., is entitled to receive out of the assets of the SICAV, fees in consideration for providing services to it, along with such out-of-pocket expenses and disbursements as are deemed reasonable and customary by the Directors. The fees payable to FundPartner Solutions (Europe) S.A., comprise asset-based fees. The actual fees paid are disclosed in the semi-annual and annual reports of the SICAV. Administration Agent fees amount to 0.05% of the net asset value per sub-fund (subject to a minimum of EUR 5,000 p.a. per sub-fund during the second year and a minimum of EUR 10,000 p.a. per sub-fund during the third and following years), and Domiciliary Agent fees amount to EUR 5,000 p.a. including up to 4 sub-funds and EUR 2,500 per additional sub-fund. The fees are accrued daily and are payable quarterly in arrears.

NOTE 10 OTHER FEES PAYABLE

As at December 31, 2019, the other fees payable include audit, independent director, domiciliation, custody, depositary, Management Company, administration and professional expenses.

NOTE 11 FUTURES CONTRACTS

The SICAV had the following futures contracts outstanding as at December 31, 2019:

BELGRAVIA LUX UCITS - EPSILON

	Maturity date	Currency	Commitment in EUR
Purchase of 1.00 EUR/GBP	16/03/2020	GBP	125,000.00
Sale of 60.00 Euro Stoxx 50 ESTX 50 EUR	20/03/2020	EUR	-2,247,090.00

The accounting of the unrealised gains and/or losses on futures contract is detailed in the note 2.b.

NOTE 12 SUBSEQUENT EVENT

No significant event occurred after the year-end.

Other information to Shareholders (unaudited appendix)

1. Remuneration of the members of the Management Company

The Management Company has adopted a remuneration policy which is in accordance with the principles established by the law of May 10, 2016, amending the law of December 17, 2010 (the "2010 Law").

The financial year of the Management Company ends on December 31 of each year.

The table below shows the total amount of the remuneration for the financial year ended as at December 31, 2019, split into fixed and variable remuneration, paid by the Management Company to its staff.

The table has been prepared taking into consideration point 162 of section 14.1 of the European Securities and Market Authority ("ESMA") remuneration guidelines relating to the confidentiality and data protection in presenting the remuneration information.

	Number of beneficiaries	Total remuneration (EUR)	Fixed remuneration (EUR)	Variable remuneration (target or discretionary bonuses, parts remuneration) (EUR)
Total remuneration paid by the Management Company during 2019	21	923	675	248

Additional explanation:

- The beneficiaries reported is composed of the risk takers (including the 4 Conducting Officers) and the staff of the Management Company dedicated to Management Company activities for all the Funds under management, remunerated by the Management Company. In addition, the Management Company did not remunerate directly the staff of the Investment Manager, but rather ensured that the Investment Manager complies with the remuneration policy requirements itself.
- The benefits have been attributed according to criteria such as level of seniority, hierarchic level, or other eligibility criteria, not taking into account performance criteria, and are thus excluded from the fixed or variable remuneration figures provided above.
- Total fixed and variable remuneration disclosed is based on apportionment of Asset Under Management represented by the SICAV.
- The 2019 annual review outcome showed no exception.
- There have been no changes to the adopted remuneration policy since its implementation.

2. Securities Financing Transactions Regulation ("SFTR")

As at December 31, 2019, the SICAV is in the scope of the requirements of the Regulation (EU) 2015/2365 on transparency of securities financing transactions and of reuse. Nevertheless, no corresponding transactions were carried out during the year referring to the financial statements.

3. Information on risk measurement

The sub-fund's global risk exposure is monitored by using the commitment approach. In that respect, financial derivative instruments are converted into their equivalent position in the underlying asset. The global risk exposure shall not exceed the sub-fund's NAV.

