

Annual report 2022



ANNUAL REPORT

for the period from 1 January 2022 to 31 December 2022

TRIGON - New Europe Fund

R.C.S. K 1870

Fund in accordance with Part I of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment in its current version as a Luxembourg investment fund (fonds commun de placement - FCP)



R.C.S. Luxembourg B 82183

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The sales prospectus including the Articles of Association, the Key Investor Information Document and the investment company's financial statements and semi-annual reports are available free of charge by post or e-mail at the registered office of the Investment Company, the Depositary Bank, Paying Agents or the Distributors in the respective countries of distribution and from the representative in Switzerland. Additional information are available from the Investment Company at all times during regular business hours.

Unit subscriptions are valid only if they are made on the basis of the most recent version of the sales prospectus (including its appendices) in conjunction with the latest available financial statements and any subsequent semi-annual report.

The AS Trigon Asset Management Fund Manager reports on behalf of the Management Company:

2022 became a year of survival for many Eastern Europe funds as Russia launched an unprovoked invasion to Ukraine and weaponized its gas flows. This unprecedented, 21-st century war in Europe combined with 20-year high inflation and substantial interest rate hikes, created an extremely turbulent macro and investment environment. We can take pride that in such a difficult year Trigon-New Europe Fund managed to offer its best alpha in past 10 years. In 2022, The Fund's A-unit declined by 4.8% (D-unit by 5.5%) while MSCI CEEC ex Russia Index fell by 20.0% in euro terms. The Fund's return compares favourably also to other global markets as MSCI EM TR index was down by 14.9%, S&P 500 by 13.4% and Stoxx Europe 600 TR Index by 10.6% in 2022, all in euro terms. We hereby want to thank all the investors in the Fund who withstood to the increased uncertainty and volatility and remained invested in our Fund.

The Fund benefited from our general value tilt and on our strategy of being over-weight in non-cyclical sectors in the beginning of 2022. The Fund generated alpha from both, bottom-up stock selection and from top-down allocation between countries, although the latter is the result from the bottom-up stock-picking. Our stock selection performed better than local market indices in 8 out of the 10 countries, being especially successful in Poland, Hungary, and Kazakhstan. In country allocation wise in absolute terms, we benefited from having off-benchmark exposure to Turkey and Greece and being over-weight in Romania and Slovenia at the expense of Poland. Our stock-picking was similarly effective on a sector basis as our selection was better in 8 sectors out of 10 from the benchmark. We did especially well with the picks among financials, energy, utilities and industrials while lagged in materials and consumer staples. In absolute terms the main contributors to performance were companies from energy, industrials and utilities sectors, while we were able to avoid the value destruction in consumer discretionary and e-commerce.

Based on 2022 expected earnings (well predictable by now) the Trigon-New Europe holdings are trading at 7.4x weighted average trailing earnings. Based on our internal estimates, in 2023 the companies in the portfolio should be able to increase their EPS by 6% on the back of less war and loan moratoria related provisioning for banks, especially in Poland. 14.2% "crises year" earnings yield looks attractive in historical context, at the same time the regional bond yields are traded also close to 20-year high levels: from 5,0% in Czech Republic to 9,0% in Hungary and 9.6% in Turkey. In 2023, we would expect further yield compression on the back of easing inflation pressures and possible rate cuts in Q4 2023 and 2024. The low ownership by GEM funds and 20-year low AUM of actively managed regional funds combined with low valuation multiples should be reasonably good arguments to have some exposure to the region going into 2023.

Looking at the company multiples, mild recession and war related uncertainty seems to be fully discounted by the market. At the end of December Trigon-New Europe Fund was trading at 2022E and 2023E earnings of 7.4x and 7.0x, respectively. 2022E EV/EBITDA for the portfolio is at 4.7x and should decline to 4.3x at 2023E. Dividend yield paid on 2022-year earnings is expected to be at 7.0%.

The TRIGON - New Europe Fund invests in companies that show solid business models, strong balance sheets and sustainable free cash flow and dividend yields. We continue to think that in a world characterised by a historically low level of returns on debt instruments and high political risks, this segment of the market in Eastern Europe offers good investment opportunities. It is the goal of TRIGON - New Europe Fund to offer superior risk-adjusted returns throughout economic cycles.

Written by Mehis Raud, Fund manager, AS Trigon Asset Management.

Luxembourg, in January 2023

The Fund Management on behalf of the Board of Directors of the Management Company

The information stated in the report is historical and is not representative of future results.

TRIGON - New Europe Fund

Annual report
1 January 2022 - 31 December 2022

The company is entitled to create unit classes with different rights.

The following unit classes currently exist with the following features:

	Class A EUR	Class A USD	Class B EUR	Class D EUR
Securitiy No.:	A2DYMA	A2DYMB	A2DYMD	A2DYMJ
ISIN:	LU1687402393	LU1687402476	LU1687402633	LU1687403102
Subscription fee:	none	none	none	none
Redemption fee:	none	none	none	none
Management	0.06 % p.a. plus	0.06 % p.a. plus	0.06 % p.a. plus	0.06 % p.a. plus
Company fee:	1,100 Euro fixed fee p.m. for the sub-fund	1,100 Euro fixed fee p.m. for the sub-fund	1,100 Euro fixed fee p.m. for the sub-fund	1,100 Euro fixed fee p.m. for the sub-fund
Minimum subsequent investment:	none	none	none	none
Use of income:	accumulative	accumulative	accumulative	accumulative
Currency:	EUR	USD	EUR	EUR

	Class E EUR
Securitiy No.:	A2DYMJ
ISIN:	LU1687403367
Subscription fee:	none
Redemption fee:	none
Management	0.06 % p.a. plus
Company fee:	300 Euro fixed fee p.m. plus 1,100 Euro fixed fee p.m. for the sub-fund
Minimum subsequent investment:	none
Use of income:	accumulative
Currency:	EUR

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Geographic classification ¹⁾

Poland	31.52 %
Hungary	17.88 %
Romania	9.64 %
Kazakhstan	9.57 %
Austria	8.13 %
Slovenia	8.10 %
Estonia	2.14 %
Croatia	2.11 %
Greece	1.25 %
Czech Republic	0.76 %
Investment in securities ²⁾	91.10 %
Cash at bank ³⁾	8.52 %
Balance of other receivables and liabilities	0.38 %
	100.00 %

Economic classification ¹⁾

Financial	43.37 %
Healthcare	9.91 %
Energy	9.27 %
Materials	5.62 %
Telecommunication	5.29 %
Consumer Discretionary	5.17 %
Industrials	4.97 %
Information Technology	2.70 %
Utilities	1.63 %
Holding	1.40 %
Real Estate	1.01 %
Communication Services	0.76 %
Investment in securities ²⁾	91.10 %
Cash at bank ³⁾	8.52 %
Balance of other receivables and liabilities	0.38 %
	100.00 %

¹⁾ Deviations in the totals are due to rounding differences.

²⁾ Including unquoted financial assets (0.09%).

³⁾ See notes on the report.

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Performance over the past 3 financial years

Class A EUR

Date	Total sub-fund net assets in millions EUR	Units outstanding	Net cash inflow in thousands EUR	Net asset value per unit EUR
31.12.2020	139.63	1,470,375	77,251.79	94.96
31.12.2021	168.99	1,391,473	-9,889.02	121.45
31.12.2022	97.07	839,684	-59,230.57	115.60

Class A USD

Date	Total sub-fund net assets in millions EUR	Units outstanding	Net cash inflow in thousands EUR	Net asset value per unit EUR	Net asset value per unit USD
31.12.2020	12.48	145,836	8,914.13	85.56	104.73 ¹⁾
31.12.2021	12.90	117,885	-2,981.39	109.43	124.19 ²⁾
31.12.2022	11.21	107,664	-1,013.77	104.16	111.09 ³⁾

Class B EUR

Date	Total sub-fund net assets in millions EUR	Units outstanding	Net cash inflow in thousands EUR	Net asset value per unit EUR
31.12.2020	10.29	111,359	-43.66	92.40
31.12.2021	13.03	110,637	-75.55	117.77
31.12.2022	11.99	109,086	-150.29	109.95

Class D EUR

Date	Total sub-fund net assets in millions EUR	Units outstanding	Net cash inflow in thousands EUR	Net asset value per unit EUR
31.12.2020	75.14	3,633,765	17,096.31	20.68
31.12.2021	103.98	3,959,713	7,139.13	26.26
31.12.2022	41.80	1,683,733	-53,490.30	24.82

Class E EUR

Date	Total sub-fund net assets in millions EUR	Units outstanding	Net cash inflow in thousands EUR	Net asset value per unit EUR
31.12.2020	21.37	661,348	-16,255.01	32.31
31.12.2021	30.65	750,732	2,762.46	40.82
31.12.2022	35.90	935,392	8,534.83	38.38

¹⁾ conversion into Euro as at 31 December 2020 1 EUR = 1.2240 USD

²⁾ conversion into Euro as at 31 December 2021 1 EUR = 1.1349 USD

³⁾ conversion into Euro as at 31 December 2022 1 EUR = 1.0665 USD

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of sub-fund net assets

as at 31 December 2022

	EUR
Investments in securities at market value	180,327,234.85
(Cost of investments: EUR 189,941,249.39)	
Cash at bank ¹⁾	16,868,725.48
Interest receivable	78,088.84
Dividend receivable	101,485.86
Receivable for units sold	1,101,738.22
Receivable from security transactions	832,681.35
Receivable from currency exchange transactions	378,590.74
Other assets ²⁾	1,313.06
	199,689,858.40
Payable on security trades	-858,509.42
Payable from currency exchange transactions	-377,065.62
Other liabilities ³⁾	-478,636.73
	-1,714,211.77
Total sub-fund net assets	197,975,646.63

Assets by unit classes

Class A EUR

Proportion of sub-fund net assets	97,070,190.51 EUR
Number of units outstanding	839,684.367
Net asset value per unit	115.60 EUR

Class A USD

Proportion of sub-fund net assets	11,214,020.18 EUR
Number of units outstanding	107,663.725
Net asset value per unit	104.16 EUR
Net asset value per unit	111.09 USD ⁴⁾

Class B EUR

Proportion of sub-fund net assets	11,993,617.20 EUR
Number of units outstanding	109,086.276
Net asset value per unit	109.95 EUR

Class D EUR

Proportion of sub-fund net assets	41,796,034.27 EUR
Number of units outstanding	1,683,733.436
Net asset value per unit	24.82 EUR

Class E EUR

Proportion of sub-fund net assets	35,901,784.47 EUR
Number of units outstanding	935,392.448
Net asset value per unit	38.38 EUR

¹⁾ See notes on the report.

²⁾ The position includes capitalisation of formation expenses.

³⁾ This position consists primarily of performance fee payables and management company fee payables.

⁴⁾ conversion into Euro as at 31 December 2022: 1 EUR = 1.0665 USD

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of changes in sub-fund net assets

for the reporting period from 1 January 2022 to 31 December 2022

	Total EUR	Class A EUR EUR	Class A USD EUR	Class B EUR EUR
Sub-fund net assets at the beginning of the reporting period	329,555,117.38	168,994,625.92	12,900,154.26	13,030,139.91
Net income	8,144,128.41	4,442,651.20	512,865.68	320,502.32
Income equalisation	1,533,126.80	1,306,621.70	21,064.06	3,796.35
Inflow of funds from the sale of units	28,217,597.16	8,154,828.64	486,375.19	14,880.08
Outflow of funds for repurchase of units	-133,567,690.46	-67,385,396.80	-1,500,144.05	-165,171.58
Realised gains	27,469,411.21	14,097,060.14	1,269,706.66	1,296,185.97
Realised losses	-29,296,388.64	-15,343,488.04	-1,550,858.01	-1,601,050.12
Net change in unrealised gains	-29,504,900.58	-15,227,137.34	-1,217,241.57	-1,231,742.74
Net change in unrealised losses	-4,574,754.65	-1,969,574.91	292,097.96	326,077.01
Total sub-fund net assets at the end of the reporting period	197,975,646.63	97,070,190.51	11,214,020.18	11,993,617.20

	Class D EUR EUR	Class E EUR EUR
Sub-fund net assets at the beginning of the reporting period	103,984,602.78	30,645,594.51
Net income	1,639,850.79	1,228,258.42
Income equalisation	535,566.38	-333,921.69
Inflow of funds from the sale of units	144,077.74	19,417,435.51
Outflow of funds for repurchase of units	-53,634,373.55	-10,882,604.48
Realised gains	7,903,490.59	2,902,967.85
Realised losses	-7,477,930.29	-3,323,062.18
Net change in unrealised gains	-8,582,298.12	-3,246,480.81
Net change in unrealised losses	-2,716,952.05	-506,402.66
Total sub-fund net assets at the end of the reporting period	41,796,034.27	35,901,784.47

Statement of changes in the number of units

	Class A EUR No. of units	Class A USD No. of units	Class B EUR No. of units	Class D EUR No. of units
Units outstanding at the beginning of the reporting period	1,391,473.297	117,885.072	110,637.239	3,959,712.979
Units subscribed	77,120.546	4,745.937	157.155	6,236.324
Units redeemed	-628,909.476	-14,967.284	-1,708.118	-2,282,215.867
Units outstanding at the end of the reporting period	839,684.367	107,663.725	109,086.276	1,683,733.436

	Class E EUR No. of units
Units outstanding at the beginning of the reporting period	750,732.434
Units subscribed	498,917.678
Units redeemed	-314,257.664
Units outstanding at the end of the reporting period	935,392.448

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of operations

for the reporting period from 1 January 2022 to 31 December 2022

	Total EUR	Class A EUR EUR	Class A USD EUR	Class B EUR EUR
Income				
Dividend income	12,414,275.33	6,675,283.91	622,763.44	650,418.89
Income from investment units	556,953.03	292,222.52	24,564.53	25,545.04
Interest on bonds	324,629.47	171,455.11	16,216.69	16,811.69
Bank interest	-4,895.57	-2,489.38	42.49	81.02
Income equalisation	-2,040,143.10	-1,631,882.35	-27,656.96	-8,676.75
Total income	11,250,819.16	5,504,589.81	635,930.19	684,179.89
Expenses				
Interest expense	-22,964.46	-11,851.00	-1,017.56	-1,037.14
Performance fee	-240,245.46	0.00	0.00	-240,245.46
Management Company and fund manager	-2,709,806.03	-1,040,595.30	-96,834.28	-94,305.36
Depositary fee	-115,606.18	-60,825.71	-5,662.92	-5,856.84
Central Administration Agent fee	-41,071.97	-21,648.22	-2,036.46	-2,108.99
Taxe d'abonnement	-104,297.83	-54,079.78	-5,447.86	-5,689.53
Publishing and auditing expenses	-28,699.41	-15,091.30	-1,601.16	-1,677.91
Setting, printing and shipping expenses for annual and semi-annual reports	-3,142.68	-1,671.81	-163.22	-169.64
Transfer agent fee	-17,992.12	-9,384.68	-874.17	-901.11
Government fees	-13,757.48	-7,154.23	-599.75	-610.84
Amortisation of formation expenses	-4,841.07	-2,558.34	-243.92	-252.95
Other expenses ¹⁾	-311,282.36	-162,338.89	-15,176.11	-15,702.20
Income equalisation	507,016.30	325,260.65	6,592.90	4,880.40
Total expenses	-3,106,690.75	-1,061,938.61	-123,064.51	-363,677.57
Net income	8,144,128.41	4,442,651.20	512,865.68	320,502.32
Total transaction costs in the reporting period ²⁾	438,418.44			
Total expense ratio as a percentage ²⁾		1.14	1.14	1.09
Performance fee as a percentage ²⁾		-	-	2.06
Swiss Total Expense Ratio without Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)		1.14	1.14	1.09
Swiss Total Expense Ratio with Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)		1.14	1.14	3.15
Swiss Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)		-	-	2.06

¹⁾ This position consists primarily of depositary fees and general administrative expenses.

²⁾ See notes on the report.

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of operations

for the reporting period from 1 January 2022 to 31 December 2022

	Class D EUR EUR	Class E EUR EUR
Income		
Dividend income	3,060,161.50	1,405,647.59
Income from investment units	155,353.31	59,267.63
Interest on bonds	83,791.00	36,354.98
Bank interest	-2,583.40	53.70
Income equalisation	-918,649.26	546,722.22
Total income	2,378,073.15	2,048,046.12
Expenses		
Interest expense	-6,655.79	-2,402.97
Performance fee	0.00	0.00
Management Company fund manager	-947,239.12	-530,831.97
Depositary fee	-30,456.19	-12,804.52
Central Administration Agent fee	-10,699.23	-4,579.07
Taxe d'abonnement	-25,273.86	-13,806.80
Publishing and auditing expenses	-6,943.44	-3,385.60
Setting, printing and shipping expenses for annual and semi-annual reports	-758.69	-379.32
Transfer agent fee	-4,861.20	-1,970.96
Government fees	-4,006.42	-1,386.24
Formation expense	-1,241.51	-544.35
Other expenses ¹⁾	-83,169.79	-34,895.37
Income equalisation	383,082.88	-212,800.53
Total expenses	-738,222.36	-819,787.70
Net income	1,639,850.79	1,228,258.42
Total expense ratio as a percentage ²⁾	1.84	2.37
Performance fee as a percentage ²⁾	-	-
Swiss Total Expense Ratio without Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)	1.84	2.37
Swiss Total Expense Ratio with Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)	1.84	2.37
Swiss Performance fee as a percentage ²⁾ (for the reporting period from 1 January 2022 to 31 December 2022)	-	-

¹⁾ This position consists primarily of depositary fees and general administrative expenses.

²⁾ See notes on the report.

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of investments as at 31 December 2022

ISIN	Securities		Purchases	Sales	Quantity	Price	Market value	% TNA ¹⁾
							EUR	
Shares, rights and participation certificates								
Transferable securities admitted to an official exchange listing								
Austria								
AT0000652011	Erste Group Bank AG	EUR	312,168	58,000	254,168	29.9500	7,612,331.60	3.85
AT0000743059	OMV AG	EUR	68,152	91,474	68,152	48.7500	3,322,410.00	1.68
AT000000STR1	Strabag SE	EUR	20,000	34,493	131,434	39.1000	5,139,069.40	2.60
							16,073,811.00	8.13
Croatia								
HRADRSA0009	Adris Grupa D.D. -VZ-	HRK	7,804	0	47,331	364.0000	2,286,764.53	1.16
HRRIVPRA0000	Valamar Riviera d.d.	HRK	178,237	0	463,434	30.5000	1,876,126.49	0.95
							4,162,891.02	2.11
Czech Republic								
CZ0005112300	Cez AS	CZK	47,258	235,964	47,258	772.0000	1,507,880.80	0.76
							1,507,880.80	0.76
Estonia								
EE3100137985	Enefit Green A.S.	EUR	0	565,255	398,771	4.3720	1,743,426.81	0.88
							1,743,426.81	0.88
Hungary								
HU0000073507	Magyar Telekom Telecommunications Plc.	HUF	257,514	5,510,690	6,367,783	338.0000	5,382,525.96	2.72
HU0000153937	MOL Magyar Olaj- és Gázipari Nyrt.	HUF	205,000	1,543,061	986,390	2,630.0000	6,487,622.73	3.28
HU0000061726	OTP Bank Nyrt.	HUF	335,513	337,107	338,208	10,180.0000	8,610,191.91	4.35
HU0000123096	Richter Gedeon Vegyészeti Gyár Nyrt.	HUF	128,924	209,102	716,579	8,315.0000	14,900,728.70	7.53
							35,381,069.30	17.88
Kazakhstan								
US46627J3023	Halyk Savings Bank of Kazakhstan JSC GDR	USD	802,047	180,502	922,528	11.2000	9,688,057.76	4.89
US48581R2058	Kaspi.kz JSC GDR	USD	188,643	44,871	143,772	68.7000	9,261,262.45	4.68
							18,949,320.21	9.57
Poland								
PLAMICA00010	Amica S.A.	PLN	16,020	0	16,020	75.0000	257,126.35	0.13
PLBH00000012	Bank Handlowy w Warszawie S.A.	PLN	0	199,306	268,399	74.0000	4,250,454.97	2.15
PLPEKAO00016	Bank Polska Kasa Opieki S.A.	PLN	419,945	442,778	434,434	87.4000	8,125,648.78	4.10
PLBNFTS00018	Benefit Systems S.A.	PLN	16,433	15,974	13,186	726.0000	2,048,672.32	1.03
PLCIECH00018	Ciech S.A.	PLN	0	212,260	168,047	40.8000	1,467,282.49	0.74
PLCOMAR00012	ComArch S.A.	PLN	196	0	79,584	169.4000	2,885,107.34	1.46
PLDMDVL00012	Dom Development S.A.	PLN	20,268	0	97,247	96.5000	2,008,289.57	1.01

¹⁾ TNA = Total net assets. Deviations in the totals are due to rounding differences.

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Statement of investments as at 31 December 2022

ISIN	Securities		Purchases	Sales	Quantity	Price	Market value	% TNA ¹⁾
							EUR	
Poland (continued)								
PLKETY000011	Grupa Kety S.A.	PLN	31,472	11,848	72,493	463.0000	7,182,900.83	3.63
PLLPP0000011	LPP S.A.	PLN	1,471	0	1,471	10,720.0000	3,374,661.87	1.70
PLPKN0000018	Polski Koncern Naftowy Orlen S.A.	PLN	257,000	0	257,000	64.5000	3,547,444.79	1.79
PLPKO0000016	Powszechna Kasa Oszczednosci [PKO] Bank Polski S.A.	PLN	1,185,587	1,068,638	2,199,461	30.5500	14,379,715.28	7.26
PLPZU0000011	Powszechny Zaklad Ubezpieczen S.A.	PLN	100,000	2,136,324	1,154,509	35.7000	8,820,401.32	4.46
PLTOYA000011	Toya S.A.	PLN	125,705	0	1,481,772	5.0900	1,614,068.54	0.82
PLWRTPL00027	Wirtualna Polska Holding S.A.	PLN	114,000	0	114,000	101.0000	2,464,047.25	1.24
							62,425,821.70	31.52
Romania								
ROTLVAACNOR1	Banca Transilvania S.A.	RON	2,898,615	11,238,520	882,133	19.9800	3,562,840.84	1.80
ROBRDBACNOR2	BRD - Groupe Societe Generale S.A.	RON	0	1,524,471	1,283,474	12.8800	3,341,718.07	1.69
NL0012294474	DIGI Communications NV	RON	68,647	30,000	236,935	31.1000	1,489,554.77	0.75
ROFPTAACNOR5	Fondul Proprietatea SA	RON	0	12,816,487	6,759,049	2.0250	2,766,798.24	1.40
ROSNPPACNOR9	OMV Petrom S.A.	RON	51,405,486	68,916,421	58,887,723	0.4195	4,993,713.19	2.52
ROSGFPACNOR4	Sphera Franchise Group S.A.	RON	0	0	1,032,603	14.0000	2,922,323.48	1.48
							19,076,948.59	9.64
Slovenia								
SI0031102120	KRKA, tovarna zdravil, d.d., Novo Mesto	EUR	0	43,964	50,829	92.8000	4,716,931.20	2.38
SI0031101346	Luka Koper D.D.	EUR	0	21,789	106,535	24.9000	2,652,721.50	1.34
US66980N2036	Nova Ljubljanska Banka d.d. GDR	EUR	0	0	279,961	12.8000	3,583,500.80	1.81
SI0031104290	Telekom Slovenije d.d.	EUR	0	6,957	106,497	47.8000	5,090,556.60	2.57
							16,043,710.10	8.10
Transferable securities admitted to an official exchange listing							175,364,879.53	88.59
Securities listed or included on organised markets								
Greece								
BE0974338700	Titan Cement International S.A.	EUR	0	25,191	205,786	12.0000	2,469,432.00	1.25
							2,469,432.00	1.25
Securities listed or included on organised markets							2,469,432.00	1.25
Unquoted financial assets								
Estonia								
N/A	Olympic Entertainment Group AS -remedial right-	EUR	0	0	1,549,316	0.1200	185,917.92	0.09

¹⁾ TNA = Total net assets. Deviations in the totals are due to rounding differences.

TRIGON - New Europe Fund

Statement of investments as at 31 December 2022

ISIN	Securities		Purchases	Sales	Quantity	Price	Market value	% TNA ¹⁾
EUR								
Poland								
PLGTBCK00297	Getback S.A.	PLN	0	0	646,764	0.0000	0.00	0.00
							185,917.92	0.09
Unquoted financial assets							185,917.92	0.09
Shares, rights and participation certificates							178,020,229.45	89.93
Bonds								
Transferable securities admitted to an official exchange listing								
EUR								
XS2378483494	11.000%	IuteCredit Finance S.à.r.l. v.21(2026)	0	664,000	2,454,000	94.0100	2,307,005.40	1.17
							2,307,005.40	1.17
Transferable securities admitted to an official exchange listing							2,307,005.40	1.17
Bonds							2,307,005.40	1.17
Investment in securities ²⁾							180,327,234.85	91.10
Cash at bank - current accounts ³⁾							16,868,725.48	8.52
Balance of other receivables and liabilities							779,686.30	0.38
Total sub-fund net assets in EUR							197,975,646.63	100.00

¹⁾ TNA = Total net assets. Deviations in the totals are due to rounding differences.

²⁾ Including unquoted financial assets (0.09%).

³⁾ See notes on the report.

Performance in percent*

as at 31 December 2022

Fund	ISIN-Code Security Ident. No.	Share class currency	6 months	1 year	3 years	10 years
TRIGON - New Europe Fund A EUR since 06.12.2018	LU1687402393 A2DYMA	EUR	9.23%	-4.82%	4.81%	---
TRIGON - New Europe Fund A USD since 04.02.2019	LU1687402476 A2DYMB	USD	11.19%	-10.55%	0.13%	---
TRIGON - New Europe Fund B EUR since 20.04.2018	LU1687402633 A2DYMD	EUR	8.56%	-6.64%	2.39%	---
TRIGON - New Europe Fund D EUR since 09.04.2018	LU1687403102 A2DYMJ	EUR	8.85%	-5.48%	2.64%	---
TRIGON - New Europe Fund E EUR since 09.04.2018	LU1687403367 A2DYMJ	EUR	8.56%	-5.98%	1.04%	---

* Based on the published net asset value (BVI method), the result corresponds to the AMAS (Asset Management Association Switzerland)'s guideline on the "Calculation and publication of the performance of collective investment funds" dated 16 May 2008.

Past performance is not an indicator of current or future performance. The performance data does not take into consideration the fees and costs imposed on the issue and redemption of the units.

The accompanying notes form an integral part of this annual report.

TRIGON - New Europe Fund

Exchange rates

For the valuation of assets in foreign currencies, conversions into Euro were performed using the following exchange rates as at 31 December 2022.

Croatian Kuna	HRK	1	7.5340
Czech Crown	CZK	1	24.1950
Hungarian Forint	HUF	1	399.8700
Polish Zloty	PLN	1	4.6728
Romanian leu	RON	1	4.9469
South African Rand	ZAR	1	18.0042
Turkish lira	TRY	1	19.9499
US Dollar	USD	1	1.0665

The accompanying notes form an integral part of this annual report.

Notes to the financial statements as at 31 December 2022 (Annex)

1.) GENERAL

The Investment Fund TRIGON ("Fund") was launched at the initiative of AS Trigon Asset Management and is managed by IPConcept (Luxembourg) S.A. The Management Regulations first entered into force on 1 February 2018. They were published in "Recueil Électronique des Sociétés et Associations" (RESA), the information platform of the Luxembourg Trade and Companies Register.

The Fund was entered in the commercial register in Luxembourg under registration number R.C.S. Luxembourg K 1870.

The Management Company has appointed AS Trigon Asset Management, a public limited company (aktsiaselts) under Estonian law, with its registered office at Pärnu mnt 18, Tallin 10141, Republic of Estonia, as the fund manager to the Fund and transferred the asset management duties to it. The Fund Manager is a fund management company for the purpose of Estonian Investment Funds Act and is subject to relevant prudential supervision. Trigon Asset Management has been active since 1994, and possesses extensive knowledge of the local economies and financial markets.

The Fund referred to is a Luxembourg investment fund (fonds commun de placement) established for an indefinite period in the form of an umbrella fund with one or more sub-funds in accordance with Part I of the Luxembourg Law of 17 December 2010 relating to undertakings for collective investment ("Law of 17 December 2010") in its current version. The Management Regulations were last amended on 1 January 2020 and published on RESA.

The Management Company of the Fund is IPConcept (Luxembourg) S.A. (the "Management Company"), a public limited company (Aktiengesellschaft) pursuant to the law of the Grand Duchy of Luxembourg, with its registered office at 4, rue Thomas Edison, L-1445 Strassen, Luxembourg. It was established for an indefinite period on 23 May 2001. Its Articles of Association were published in the Mémorial on 19 June 2001. The most recent amendment to the Articles of Association entered into force on 27 November 2019 and was published in the RESA on 12 December 2019. The Management Company is entered in the Luxembourg Trade and Companies Register under registration number R.C.S. Luxembourg B 82183.

As at 31 December 2021, the TRIGON Fund consists of one sub-fund, the TRIGON - New Europe Fund. As at 31 December 2022, the composition and change of the net sub-fund assets, the profit and loss account and the statement of assets therefore also corresponds to the combined statement of the TRIGON Fund.

2.) SIGNIFICANT ACCOUNTING POLICIES

This report is drawn up under the responsibility of the Executive Board of the Management Company in accordance with the legal provisions applicable in Luxembourg and the standards for the preparation and presentation of reports.

1. The Fund's net assets are denominated in euro (EUR) ("reference currency").
2. The value of a unit ("unit value") is denominated in the currency set out in the respective Annex to the Sales Prospectus ("sub-fund currency"), insofar as no other currency is stipulated for any unit classes in the respective Annex to the Sales Prospectus ("unit class currency").
3. The unit value is calculated by the Management Company or a third party commissioned for this purpose by the Management Company, under the supervision of the Depositary, on each banking day in Luxembourg with the exception of 24 and 31 December of each year as well as Estonian holidays („valuation day") and rounded off to two decimal places. The Management Company may decide on a different arrangement for individual sub-funds, in which case it should be taken into account that the unit value must be calculated at least twice a month.

The Management Company may, however, decide to determine the unit value on 24 and 31 December without these determinations of value being considered calculations of the unit value on a valuation day within the meaning of the first sentence of this point 3. Consequently, investors cannot demand the issue, redemption and/or exchange of units on the basis of a unit value determined on 24 December and/or 31 December of a given year.

4. In order to calculate the unit value, the value of the assets of each sub-fund less the liabilities of each sub-fund ("net sub-fund assets") is determined on each valuation day, and this figure is divided by the number of sub-fund units in circulation on the valuation day.
5. If applicable legal regulations or the provisions of these Management Regulations require the situation of the Fund assets in their entirety to be described in the annual or semi-annual reports and/or in other financial statistics, the assets of the relevant sub-fund will be converted into the reference currency. Net sub-fund assets are calculated according to the following principles:
 - (a) Transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets officially listed on a securities exchange are valued at the latest available trade price which provides a reliable valuation on the trading day preceding the valuation day.

The Management Company may stipulate for individual sub-funds that transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets officially listed on a securities exchange are valued at the latest available closing price which provides a reliable valuation. Details on this can be found in the Annexes to the Sales Prospectus for the relevant sub-funds.

Notes to the financial statements as at 31 December 2022 (Annex)

If transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets are officially listed on several stock exchanges, the one with the highest liquidity shall be applicable.

- (b) Transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets which are not officially listed on a securities exchange (or whose stock exchange rates are not deemed representative, e.g. due to lack of liquidity) but which are traded on another regulated market, shall be valued at a price no less than the bid price and no more than the offer price of the trading day preceding the valuation day, and which the Management Company considers in good faith to be the best possible price at which the transferable securities, money market instruments, derivative financial instruments (derivatives) and other investments can be sold.

The Management Company may stipulate for individual sub-funds that transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets which are not officially listed on a securities exchange (or whose stock exchange rates are not deemed representative, e.g. due to lack of liquidity) but which are traded on another regulated market, be valued at the latest available price which the Management Company considers in good faith to be the best possible price at which the transferable securities, money market instruments, derivative financial instruments (derivatives) and other investments can be sold. Details on this can be found in the Annexes to the Sales Prospectus for the relevant sub-funds.

- (c) OTC derivatives are valued on a daily basis by means of a valuation to be determined and able to be checked by the Management Company.
- (d) Units in UCI/UCITS are determined at the last redemption price set before the valuation day or are valued at the latest available price which provides a reliable valuation. If the redemption is suspended or no redemption prices are established for certain investment units, these units and all other assets will be valued at their appropriate market value, as determined in good faith by the Management Company in line with generally accepted and verifiable valuation rules.
- (e) If the prices in question are not fair market prices, if the financial instruments under (b) are not traded on a regulated market, and if no prices are set for financial instruments different from those listed under (a)–(d), then these financial instruments and the other legally permissible assets shall be valued at their current market value, which shall be established in good faith by the Management Company on the basis of generally accepted and verifiable valuation rules (e.g. suitable valuation models taking account of current market conditions).
- (f) Liquid funds are valued at their nominal value plus interest.
- (g) Amounts due (e.g. deferred interest claims and liabilities) shall, in principle, be rated at their par value.
- (h) The market value of securities and other investments which are denominated in a currency other than the currency of the relevant sub-fund shall be converted into the currency of the sub-fund at the last mean rate of exchange (WM/Reuters fixing at 4 pm London time). Gains and losses from foreign exchange transactions will on each occasion be added or subtracted.

The Management Company may stipulate for individual sub-funds that the transferable securities, money market instruments, derivative financial instruments (derivatives) and other assets denominated in a currency other than that of the sub-fund shall be converted into the sub-fund currency at the exchange rate of the trading day preceding the valuation day, using WM/Reuters fixing at 17:00 (16:00 GMT). Profits and losses from foreign exchange transactions shall, on each occasion, be added or subtracted. Details on this can be found in the Annexes to the sales prospectus to the relevant sub-funds.

The respective net sub-fund assets will be reduced by any distributions paid to the investors of the respective sub-fund, where applicable.

- 6. The net asset value per unit is calculated separately for each sub-fund pursuant to the aforementioned criteria. However, if there are different unit classes within a sub-fund, the net asset value per unit will be calculated separately for each unit class within this fund pursuant to the aforementioned criteria. The composition and allocation of assets always occurs separately for each sub-fund.

The tables published in this report may, for arithmetical reasons, contain rounding differences which are higher or lower than a unit (currency, percentage, etc.).

REMEDIAL RIGHTS

In the portfolio of the investment fund, remedial rights of companies were recorded for which appraisal proceedings were opened. Appraisal proceedings are regularly initiated by minority shareholders following corporate structural measures (the most important case is the so-called squeeze-out), which lead to the disposal of the shares of the minority shareholders in return for the granting of a compensation payment.

The reason for a legal challenge is that the minority shareholders do not agree with the amount of the compensation.

Within the framework of the appraisal proceedings, the required compensation is reviewed by the courts.

The result is that the court can set or confirm a higher level of compensation; a reduction in the amount of compensation is not possible. This leads to a possible legal claim of all minority shareholders („right of rectification“).

Notes to the financial statements as at 31 December 2022 (Annex)

Valuation of remedial rights:

As a general rule, the valuation of the rights is carried out at a value of zero, provided that there are no price sources, no documents relevant for the valuation or other information on the basis of which a different valuation rate could be derived.

A model-based valuation approach cannot reliably determine the probable value, as the value of a potential rectification is only determined at the end of the legal proceedings.

The decision on the amount of the rectification is based on the respective assessment of the individual case by a court, whose judgement or a potentially awarded value of the rectification cannot be predicted with sufficient certainty.

A deviating valuation of rights shall be applied in each case if the fund manager and/or the management company has in good faith reasonable information on the probable sales value of the remediation right.

The rectification claim determined by the court at the end of the proceedings may differ from the valuation of the management company.

The valuation approaches for individual remedial rights are continuously reviewed for adequacy and applied uniformly at the level of the management company.

Note to the remedial right Olympic Entertainment Group AS -remedial right-

As at the reporting date of the annual financial statements on 31 December 2022, there is a remedial right from a past settlement case in the portfolio.

Ongoing adjustment procedure (as of 31 December 2022) for Olympic Entertainment Group AS -remedial right-, with 1,549,316 units held in portfolio. The units of the remedial right in the fund assets amounts to 0.09% of the net assets.

The case is currently pending in the Estonian court system. The court has requested for an independent valuation report of the company.

Once this will be provided a first hearing will be announced. Due to the current situation the fund management has no indication to change the valuation of 0.12 EUR per right, which according to the fund management represents the most probable sales value of the rectification right.

3.) TAXATION

Taxation of the Investment Fund

From a Luxembourg tax perspective, the Fund as an investment fund has no legal personality and is tax-transparent. The Fund is not subject to taxation on its income and profits in the Grand Duchy of Luxembourg. The Fund's assets are only subject to the „taxe d'abonnement“ of currently 0.05% p.a. A reduced „taxe d'abonnement“ of 0.01% p.a. is applied to (i) the sub-funds or unit classes whose units are issued exclusively to institutional investors within the meaning of Article 174 of the Law of 17 December 2010, (ii) sub-funds whose sole purpose is to invest in money market instruments, in time deposits with credit institutions or both. The „taxe d'abonnement“ is payable quarterly, based on the Fund's net assets reported at the end of each quarter. The amount of the „taxe d'abonnement“ is specified for each sub-fund or unit class in the relevant Annex to this Sales Prospectus. An exemption from the „taxe d'abonnement“ applies, inter alia, to the extent that the Fund's assets are invested in other Luxembourg investment funds, which in turn are already subject to the „taxe d'abonnement“.

Income received by the Fund (in particular, interest and dividends) may be subject to withholding or investment tax in the countries in which the Fund assets are invested. The Fund may also be taxed on realised or unrealised capital gains of its investments in the source country.

Distributions by the Fund and liquidation and disposal gains are not subject to withholding tax in the Grand Duchy of Luxembourg. Neither the Depositary nor the Management Company are required to obtain tax certificates.

Taxation of income from units held by the investor in the Investment Fund

Investors who are or were not resident in the Grand Duchy of Luxembourg for tax purposes and have no permanent establishment or permanent representative there are not subject to Luxembourg income tax on their income or capital gains from their shares in the Fund. Natural persons who are resident in the Grand Duchy of Luxembourg for tax purposes are subject to progressive Luxembourg income tax.

Companies that are resident in the Grand Duchy of Luxembourg for tax purposes are subject to corporation tax on the income from the Fund units.

Interested parties and investors are recommended to find out about laws and regulations which are applied to the taxation of the Fund's assets, the subscription, the purchase, the ownership, the redemption or the transfer of units and to call on the advice of external third parties, especially a tax adviser.

4.) USE OF INCOME

The Management Company may distribute the income generated by the Fund to investors or reinvest this income in the Fund. Details on this can be found for the Fund in the corresponding Annex to the Sales Prospectus.

Notes to the financial statements as at 31 December 2022 (Annex)

5.) INFORMATION ON FEES AND EXPENSES

Please refer to the current sales prospectus for information regarding management and depositary fees.

6.) TRANSACTION COSTS

Transaction costs include all costs which, during the financial year, were shown or calculated separately on behalf of the Fund and which are directly connected with the purchase or sale of assets.

7.) INCOME AND EXPENSE EQUALISATION

The income equalisation is included in the ordinary net income. This covers net income arising during the period under review which the purchaser of units pays for as part of the issue price and the seller of units receives as part of the redemption price.

8.) RISK MANAGEMENT

The Management Company employs a risk management process enabling it to monitor and assess the risk connected with the investment holdings, as well as their share in the total investment portfolio risk profile of the funds it manages, at all times. In accordance with the Law of 17 December 2010 and the applicable prudential supervisory requirements of the Commission de Surveillance du Secteur Financier ("CSSF"), the Management Company reports regularly to the CSSF about the risk management process used. Within the framework of the risk management process and using the necessary and appropriate methods, the Management Company ensures that the overall risk associated with derivatives of the funds managed does not go beyond the total net value of their portfolios.

To this end, the Management Company makes use of the following methods:

Commitment approach

With the commitment approach, the positions from derivative financial instruments are converted into their corresponding (possibly delta-weighted) underlying equivalents or nominal values. In doing so, the netting and hedging effects between derivative financial instruments and their corresponding underlying instruments are taken into account. The total of these underlying equivalents may not exceed the total net value of the fund's portfolio.

Value-at-risk (VaR) approach:

The VaR figure is a mathematical-statistical concept and is used as a standard risk measure in the financial sector. VaR indicates the possible loss of a portfolio that will not be exceeded during a certain period (the holding period) with a certain probability (the confidence level).

- **Relative VaR approach:**

With the relative VaR approach, the VaR of the Fund must not exceed the VaR of a reference portfolio by more than a factor dependent on the amount of the Fund's risk profile. The maximum permissible factor specified by the supervisory authority is 200%. The reference portfolio is essentially an accurate reflection of the Fund's investment policy.

- **Absolute VaR approach:**

With the absolute VaR approach, the VaR (99% confidence level, 20-day holding period) of the Fund may not exceed a portion of the Fund's assets dependent on the Fund's risk profile. The maximum permissible factor specified by the supervisory authority is 20% of the Fund's assets.

In accordance with the prospectus valid at the end of the reporting period, the commitment approach was used to monitor and measure the total risk associated with derivatives for the sub-fund.

9.) EVENTS DURING THE REPORTING PERIOD

With effect from 1 January 2022 the following amendments were made to the Sales Prospectus of the Funds:

- Implementation of the Taxonomy Regulation,
- Implementation of the ESMA Guidelines on Performance Fees,
- Model adjustments and editorial changes to the Prospectus.

With effect from 31 December 2022 the following amendments were made to the Sales Prospectus of the Funds:

- Implementation of the requirements of Art. 7 of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector (Sustainable Finance Disclosure Regulation - SFDR, „Disclosure Regulation“) with effect from 30 December 2022,
- Model adjustments and editorial changes.

Notes to the financial statements as at 31 December 2022 (Annex)

Russia/Ukraine conflict

As a result of the measures decided worldwide due to the invasion of Russian troops into Ukraine at the end of February 2022, European stock exchanges in particular recorded significant price losses. In the medium term, the financial markets and the global economy are facing a future characterised primarily by uncertainty. The impact on the fund's assets resulting from the ongoing conflict in Ukraine cannot be anticipated. As the fund did not and does not have any investments related to Russia or Belarus, it was not affected by the sanctions that were imposed, but it could not completely escape the general effects on the global markets.

At the time of preparing this report, the Management Company is of the opinion that there are no indications that speak against the continuation of the Fund and its sub-funds, nor have there been any valuation or liquidity problems for the Fund.

The Management Company has established appropriate monitoring measures and controls to assess the impact on the Fund and its sub-funds in a timely manner.

Apart from the above mentioned amendments, no further significant events occurred during the reporting report.

10.) EVENTS AFTER THE REPORTING PERIOD

There were no significant events after the reporting period.

11.) GENERAL EXPLANATIONS IN RELATION TO THE COVID-19 PANDEMIC

Since the turn of 2019/2020, the Covid-19 coronavirus has spread to most continents; in March 2020, Covid-19 was classified as a pandemic by the WHO. At this time, it is not possible to predict the future impact of the resulting risk on the assets and liabilities in the portfolio. However, global economic activity is likely to be significantly impacted. There are currently no indications that speak against the continuation of the fund.

12.) CURRENT ACCOUNTS (CASH AT BANK / LIABILITIES TO BANKS) OF THE SPECIFIC SUB-FUND

All current accounts of the respective sub-fund (even if they are in different currencies) which constitute in fact and at law merely elements of a single indivisible current account, are disclosed as one indivisible current account in the statement of net assets of the respective sub-fund. Current accounts in foreign currencies, if existing, are converted in the respective sub-fund currency. The requirements for each account apply as basis for the interest calculation.

13.) PERFORMANCE FEE

For the Class B EUR the Fund Manager may also receive a performance fee of up to 15% (maximum) of the amount by which the performance of the unit value exceeds that of the benchmark index at the end of an accounting period (outperformance over the benchmark index).

If the performance of the unit value at the end of an accounting period (1 year) is less than that of the benchmark index (underperformance against the benchmark), then the Fund Manager will not receive a performance fee. Correspondingly, when calculating outperformance against the benchmark, the negative amount per unit value is calculated based on the agreed maximum amount and carried over to the next accounting period. For the next accounting period, the Fund Manager will only receive a performance fee if the amount calculated at the end of the new accounting period – based on outperformance against the benchmark – exceeds the negative amount carried over from the previous accounting period. In this case, the entitlement to a fee is based on the difference between both amounts. Any remaining negative balance per unit value will again be carried over to the next accounting period. If there is underperformance against the benchmark again at the end of the following accounting period, then the negative amount carried over will be added to the amount calculated from the new underperformance. Negative amounts carried over from the previous 5 accounting periods shall be taken into account when calculating the entitlement to fees.

The accounting period begins on the first day of each year and ends on the last day of each year. The first accounting period begins with the launch of the Fund and ends on the end of the second year following launch.

The benchmark index is set as MSCI EFM CEEC ex Russia Net Return (NU136621).

The performance fee is determined by comparing the performance of the benchmark index during the accounting period with that of the unit value. Costs charged to the Fund may not be deducted from the performance of the benchmark index before the comparison. Provision for any accrued performance fee shall be made in the Fund on the basis of the results of a daily comparison. If the unit value performance during the accounting period is below the benchmark index, then any performance fee already reserved during that accounting period shall be eliminated, depending on the daily comparison. Any reserved performance fee outstanding at the end of the accounting period may be paid out.

Notes to the financial statements as at 31 December 2022 (Annex)

Unit Value: Net asset value per unit, i.e. gross asset value per unit less all pro rata costs such as management fees, depositary fees, any performance fee and other costs charged to the unit certificate class. This unit value corresponds to the published unit price.

The performance fee may be paid out even if the unit value at the end of the accounting period is less than the unit value at the start of the accounting period (absolute negative unit value performance).

These fees are exclusive of any value added tax.

For the financial year ending 31 December 2022, the actual performance fee accrued and the corresponding performance fee percentage (calculated on the basis of the respective average net assets of the sub-funds) for the respective sub-funds are as follows:

Currency	Sub-fund / share class	ISIN	Performance Fee	
			in EUR	in %
EUR	TRIGON - New Europe Fund B EUR	LU1687402633	240,245.46	2.06

14.) LIST OF PURCHASES AND SALES OF SECURITIES AND DERIVATIVES DURING THE REPORTING YEAR

A detailed statement of all purchases and sales of securities, promissory note loans (Schuldscheindarlehen) and derivatives, including all cost movements not included in the statement of investments made during the reporting year is available free of charge upon request at the registered office of the Investment Company.



Audit report

To the Unitholders of
TRIGON

Our opinion

In our opinion, the accompanying financial statements give a true and fair view of the financial position of TRIGON (the “Fund”) as at 31 December 2022, and of the results of its operations and changes in its 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.

What we have audited

The Fund’s financial statements comprise:

- the statement of sub-fund net assets as at 31 December 2022;
- the statement of changes in sub-fund net assets for the year then ended;
- the statement of operations for the year then ended;
- the statement of investments as at 31 December 2022; and
- the notes to the financial statements, which include a summary of significant accounting policies.

Basis for opinion

We conducted our audit in accordance with the Law of 23 July 2016 on the audit profession (Law of 23 July 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 23 July 2016 and ISAs as adopted for Luxembourg by the CSSF are further described in the “Responsibilities of the “Réviseur d’entreprises agréé” for the audit of the financial statements” section of our report.

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

We are independent of the Fund in accordance with the International Code of Ethics for Professional Accountants, including International Independence Standards, issued by the International Ethics Standards Board for 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. We have fulfilled our other ethical responsibilities under those ethical requirements.

Other information

The Board of Directors of the Management Company is responsible for the other information. The other information comprises the information stated in the annual report but does not include the financial statements and our audit report 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 identified above 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 that fact. We have nothing to report in this regard.

Responsibilities of the Board of Directors of the Management Company for the financial statements

The Board of Directors of the Management Company is responsible for the preparation and fair presentation of the 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 Management Company 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 Management Company is responsible for assessing the Fund'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 Management Company either intends to liquidate the Fund 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

The objectives of our audit 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 audit 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 the Law of 23 July 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 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional scepticism 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 Fund'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 Management Company;



- conclude on the appropriateness of the Board of Directors of the Management Company's 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 Fund's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our audit report 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 audit report. However, future events or conditions may cause the Fund 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.

PricewaterhouseCoopers, Société coopérative
Represented by

Luxembourg, 19 April 2023

Björn Ebert

Additional notes (unaudited)

1.) RISK MANAGEMENT

The Management Company employs a risk management process enabling it to monitor and assess the risk connected with the investment holdings, as well as their share in the total investment portfolio risk profile of the funds it manages, at all times. In accordance with the Law of 17 December 2010 and the applicable prudential supervisory requirements of the Commission de Surveillance du Secteur Financier ("CSSF"), the Management Company reports regularly to the CSSF about the risk management process used. Within the framework of the risk management process and using the necessary and appropriate methods, the Management Company ensures that the overall risk associated with derivatives of the funds managed does not go beyond the total net value of their portfolios.

To this end, the Management Company makes use of the following methods:

Commitment approach

With the commitment approach, the positions from derivative financial instruments are converted into their corresponding (possibly delta-weighted) underlying equivalents or nominal values. In doing so, the netting and hedging effects between derivative financial instruments and their corresponding underlying instruments are taken into account. The total of these underlying equivalents may not exceed the total net value of the fund's portfolio.

Value-at-risk (VaR) approach:

The VaR figure is a mathematical-statistical concept and is used as a standard risk measure in the financial sector. VaR indicates the possible loss of a portfolio that will not be exceeded during a certain period (the holding period) with a certain probability (the confidence level).

- **Relative VaR approach:**
With the relative VaR approach, the VaR of the Fund must not exceed the VaR of a reference portfolio by more than a factor dependent on the amount of the Fund's risk profile. The maximum permissible factor specified by the supervisory authority is 200%. The reference portfolio is essentially an accurate reflection of the Fund's investment policy.
- **Absolute VaR approach:**
With the absolute VaR approach, the VaR (99% confidence level, 20-day holding period) of the Fund may not exceed a portion of the Fund's assets dependent on the Fund's risk profile. The maximum permissible factor specified by the supervisory authority is 20% of the Fund's assets.

In accordance with the prospectus valid at the end of the reporting period, the commitment approach was used to monitor and measure the total risk associated with derivatives for the sub-fund.

2.) ACTIVITIES OF IPCONCEPT (LUXEMBOURG) S.A. AND OF DZ PRIVATBANK S.A. IN THE CONTEXT OF THE COVID-19 PANDEMIC

In order to protect itself against the corona virus, the Management Company IPConcept (Luxembourg) S.A. has taken various measures affecting its employees and external service providers at its locations in Luxembourg, Switzerland and Germany, which will ensure its business processes even in a crisis scenario.

In addition to extensive hygiene measures on the premises and restrictions on business trips and events, further precautions have been taken to ensure that the Management Company can guarantee the reliable and smooth running of its business processes in the event of a suspected case of coronavirus infection among its staff. By expanding the technical possibilities for mobile working and activating the Business Recovery Center at the Luxembourg location, IPConcept (Luxembourg) S.A. has created the conditions for distributing employees across several workplaces. This will significantly reduce the potential risk of coronavirus transmission within the management company.

The safety and health of employees, customers and business partners are essential priorities. Since April 2020, a consistently high mobile working rate of more than 75% has been established in the Bank, which has recently increased further. The Bank adheres its strict protective measures across all locations, but continues to offer flexible emergency management: e.g. close monitoring of incidences and adjustment of the Bank-wide Corona measures (gradual withdrawal of measures vs. retention). The increased remote distribution and digital exchange formats will be continued until further notice. Bank operations/distribution continue to function smoothly. Business operations are continuing to be assured. The Management Company, the emergency team of the Bank and the management are closely monitoring the containment measures and the economic impact of the virus.

3.) TRANSPARENCY OF SECURITIES FINANCING TRANSACTIONS AND THEIR REUSE

IPConcept (Luxembourg) S.A. is acting as a management company of undertakings for collective investment in transferable securities ("UCITS") and alternative investment fund manager ("AIFM") and thus falls by definition within the scope of Regulation (EU) 2015/2365 of the European Parliament and of the Council of November 25th, 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 ("SFTR").

During the reporting period of the Investment Fund no investments have been undertaken in securities financing transactions or total return swaps as defined in this regulation. Therefore, the notes specified in Article 13 of this regulation will not be disclosed in the semi-annual report. Detailed information on the investment company investment strategy and the financial instruments used can be found in the current sales prospectus and on the Management Company's website (www.ipconcept.com).

Additional notes (unaudited)

4.) INFORMATION ON THE REMUNERATION SYSTEM

The Management Company IPConcept (Luxemburg) S.A. has established a remuneration system that complies with legal and regulatory requirements. It is consistent with and conducive to sound and effective risk management and does not encourage or prevent risk-taking that is incompatible with the risk profiles, contractual rules or articles of incorporation of the managed undertakings for collective investment in transferable securities (hereinafter „UCITS“), nor prevents IPConcept (Luxemburg) S.A. from acting according to its duty in the best interests of the UCITS.

The remuneration policy is in line with the business strategy, goals, values and interests of IPConcept (Luxemburg) S.A. and the UCITS it manages and their investors and includes measures to avoid conflicts of interest.

Non-tariff employees are subject to the remuneration system for non-tariff employees of IPConcept (Luxemburg) S.A. The remuneration of non-tariff employees consists of an appropriate fixed annual salary and variable performance and result-related remuneration. Each non-tariff position is evaluated based on the criteria of knowledge / ability, problem solving, responsibility and strategic importance and assigned to one of four levels of responsibility. Non-tariff employees receive an individual reference bonus that is linked to the relevant level of responsibility. The bonus system links the reference bonus with both the individual performance and the performance of the respective segments as well as the result of the DZ PRIVATBANK Group as a whole.

The identified employees are subject to the remuneration system for identified IPConcept (Luxemburg) S.A. employees. The remuneration of identified employees consists of an appropriate fixed annual salary and a variable achievement and results-based remuneration. The maximum achievable bonus amount of an identified employee must not exceed the contractually fixed annual salary. The performance-based remuneration is based on an assessment of the performance of the employee concerned and his/her department or relevant UCITS, as well as its risks and the overall result of IPConcept (Luxemburg) S.A. Financial and nonfinancial criteria are taken into account when assessing individual achievement.

As at 31 December 2022, the total remuneration of the 64 employees of IPConcept (Luxemburg) S.A. as a Management Company is EUR 6,773,175.02 This is divided into:

Fixed remunerations:	EUR 6,180,635.16
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Variable remuneration:	EUR 592,539.86
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For those at the Management Company in management roles whose activities have a significant impact on the risk profile of the UCITS:	EUR 1,382,314.91
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For Management Company employees whose activities have a significant impact on the risk profile of the UCITS:	EUR 0.00
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The remuneration shown above relates to all the UCITS and alternative investment funds managed by IPConcept (Luxemburg) S.A. All employees are collectively employed to manage all of the funds, so it is not possible to break the remuneration down by fund.

An assessment is carried out centrally and independently once a year to determine whether the remuneration policy is implemented in accordance with the remuneration regulations and procedures stipulated by the IPConcept (Luxemburg) S.A. Supervisory Board.

The review showed that all relevant regulations have been implemented. No irregularities were found. The Supervisory Board has acknowledged the report on the central and independent review of the implementation of the remuneration policy 2022.

As part of the implementation of the CRD V Directive (2013/36/EU) in national legislation in Luxembourg and Germany, various laws and supervisory guidelines that apply directly and indirectly to DZ PRIVATBANK were adapted. The changes to the regulatory framework for remuneration in 2021 were implemented in the remuneration systems of DZ PRIVATBANK on 1 January 2022. An extended retention period is particularly relevant in the event of the delayed payment of retained variable remuneration for identified employees. The remuneration systems in 2022 correspond to the provisions of the Institute Remuneration Ordinance (version of 25 September 2021).

Further information regarding the current remuneration system is available on the Management Company's website www.ipconcept.com under the heading „Investor Information“. A paper version is available to investors free of charge upon request.

Information on employee remuneration in the event of outsourcing

The Management Company IPConcept (Luxemburg) S.A. has outsourced the Fund Manager function. The management company does not pay any direct remuneration from the fund assets to employees of the outsourcing company. The outsourcing company has published the following information itself:

The total remuneration of the 9 employees of AS Trigon Asset Management as fund managers of the fund TRIGON was EUR 769,285.00 as at 31 December 2022.

Additional notes (unaudited)

Total amount paid in the past financial year ended 31 December 2022

of the Outsourcing Company employee remuneration paid: EUR 769,285.00

Of which fixed remuneration: EUR 491,887.00

Of which variable remuneration: EUR 277,398.00

Remuneration paid directly from the fund: EUR 0.00

Number of employees of the outsourcing company: 9

5). CLASSIFICATION ACCORDING TO SFDR REGULATION (EU 2019/2088)

The Fund Manager is not currently taking account of any adverse impact of investment decisions on sustainability factors for this sub-fund. The available relevant data that must be used to determine and weight the adverse sustainability impacts are currently inadequate on the market. By no later than 30 December 2022, the Fund Manager will provide information on whether and how the main adverse effects of investment decisions on sustainability factors are taken into consideration.

The sub-fund does not promote sustainable features nor has it the objective of sustainable investment within the meaning of Article 8 or Article 9 of Regulation (EU) 2019/2088. In accordance with the provisions of Article 7 of Regulation (EU) 2020/852 (EU taxonomy), attention is drawn to the following in this context:

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

6.) INFORMATION FOR SWISS INVESTORS

a.) General Information

The Sales Prospectus including the Articles of Association, the Key Investor Information Document and the Investment Company's financial statements and semi-annual reports as well as a statement detailing all purchases and sales made during the financial year are available free of charge by post or e-mail at the Swiss Representative.

b) Securities number

TRIGON - New Europe Fund A EUR	38726626
TRIGON - New Europe Fund A USD	38726631
TRIGON - New Europe Fund B EUR	38726642
TRIGON - New Europe Fund D EUR	38726652
TRIGON - New Europe Fund E EUR	38726653

c) Total Expense Ratio (TER)

The commissions and fees incurred for managing the collective capital investments must be reported in the indicator known internationally as the total expense ratio (TER). This indicator expresses the total of all commission and fees regularly incurred (operating expenses) by the capital of the collective investment retrospectively as a percentage of the net assets; in principle, it is calculated using the following formula:

$$\text{TER \%} = \frac{\text{Total operating expenses in UA}^*}{\text{Average net assets in UA}^*} \times 100$$

* UA = Units in the accounting currency of the collective capital investment

The Asset Management Association Switzerland is the industry organisation of the Swiss asset management industry.

According to the Asset Management Association Switzerland guideline of 16 May 2008 (amended as at 5 August 2021), the following TER was calculated in per cent for the period from 1 January 2022 to 31 December 2022:

	Swiss TER without Performance Fee	Swiss TER with Performance Fee	Swiss Performance Fee
TRIGON - New Europe Fund A EUR	1.14%	1.14%	-*
TRIGON - New Europe Fund A USD	1.14%	1.14%	-*
TRIGON - New Europe Fund B EUR	1.09%	3.15%	2.06%
TRIGON - New Europe Fund D EUR	1.84%	1.84%	-*
TRIGON - New Europe Fund E EUR	2.37%	2.37%	-*

* No performance fee has been agreed for this unit class in accordance with the current sales prospectus.

Additional notes (unaudited)

d) Information for investors

Fees for the distribution of the investment sub-fund (trailer fees) may be paid to distributors and asset managers from the fund management fee. Institutional unitholders who hold fund units for third parties may be granted retrocessions from the management fee.

e) Changes to the prospectus in the financial year

Publications of amendments to the prospectus during the financial year shall be made available for consultation on www.swissfunddata.ch.

Administration, distribution and advisory

Management Company

IPConcept (Luxemburg) S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Supervisory Board of the Management Company

Chairman of the Supervisory Board

Dr. Frank Müller
Member of the Executive Board
DZ PRIVATBANK S.A.

Members of the Supervisory Board

Klaus-Peter Bräuer
Bernhard Singer

Executive Board of the Management Company (management body)

Chairman of the Executive Board

Marco Onischschenko

Members of the Executive Board

Marco Kops (until 28 February 2022)
Silvia Mayers
Nikolaus Rummler

Fund Manager

AS Trigon Asset Management
Pärnu mnt 18
10141 Tallinn
Republic of Estonia

Depositary

DZ PRIVATBANK S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Central Administration Agent, registrar and transfer agent

DZ PRIVATBANK S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Paying agents

Grand Duchy of Luxembourg

DZ PRIVATBANK S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Sweden

MFEX Mutual Funds Exchance AB
Grev Turegatan 19
Box 5378
SE-10249 Stockholm

United Kingdom

Financial Express Ltd.
3rd Floor, Hollywood House
Church Street East
Woking, GU216HJ

Additional information for investors in the Federal Republic of Germany:

Paying and information agent

Federal Republic of Germany
(until 31 March 2022)

DZ BANK AG
Deutsche Zentral-Genossenschaftsbank
Frankfurt am Main
Platz der Republik
D-60265 Frankfurt am Main

Contact and information agent (since 1 April 2022)

DZ PRIVATBANK S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Administration, distribution and advisory

Additional information for investors in the Republic of Austria:

Credit institution within the meaning of §141(1) Investmentfondsgesetz (Investment Fund Act - InvFG) 2011 (until 31 March 2022)

Erste Bank der oesterreichischen Sparkassen AG
Am Belvedere 1
A-1100 Wien

Office from which the unitholders can obtain the information stipulated under § 141 InvFG 2011 (until 31 March 2022)

Erste Bank der oesterreichischen Sparkassen AG
Am Belvedere 1
A-1100 Wien

Contact and information agent in accordance with the Provisions under EU Directive 2019/1160 Art. 92 (since 1 April 2022)

DZ PRIVATBANK S.A.
4, rue Thomas Edison
L-1445 Strassen, Luxembourg

Domestic tax representative within the meaning of § 186(2)(2) InvFG 2011

PwC Austria
Donau-City-Straße 7
A-1220 Wien

Additional information for investors in Switzerland:

Sales representative in Switzerland

IPConcept (Schweiz) AG
Münsterhof 12 Postfach
CH-8022 Zürich

Paying agent

DZ PRIVATBANK (Schweiz) AG
Münsterhof 12 Postfach
CH-8022 Zürich

Fund auditor

PricewaterhouseCoopers, Société coopérative
2, rue Gerhard Mercator
B.P. 1443
L-1014 Luxembourg

Auditor of the Management Company

PricewaterhouseCoopers, Société coopérative
2, rue Gerhard Mercator
B.P. 1443
L-1014 Luxembourg

