

# **Achilles Investment Company Limited**

## **Interim Report and Unaudited Condensed Interim Financial Statements**

For the period from incorporation on 20 January 2025 to 31 December 2025

# Achilles Investment Company Limited

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# Achilles Investment Company Limited

## Company Overview

For the period from incorporation on 20 January 2025 to 31 December 2025

Achilles Investment Company Limited (“Achilles” or the “Company”) is a Guernsey-domiciled company, incorporated under The Companies (Guernsey) Law, 2008 (as amended) on 20 January 2025 as a non-cellular company limited by shares with an indefinite life. The Company is registered with the Guernsey Financial Services Commission as a registered closed-ended collective investment scheme pursuant to the Protection of Investors (Bailiwick of Guernsey) Law, 2020 and the Registered Collective Investment Scheme Rules and Guidance, 2021.

The Company’s investment objective is to invest in the shares of companies admitted to trading on a market of the London Stock Exchange and to seek to maximise value for shareholders.

## Highlights

Highlights in the reporting period to 31 December 2025 include:

Four activist campaigns and/or corporate actions successfully concluded

- Urban Logistics REIT plc
- Empiric Student Property plc
- HICL Infrastructure plc
- Life Science REIT plc

Two ongoing with outcomes in the short term

- Aquila European Renewables plc
- Spire Healthcare Group plc

➤ The NAV increased by 0.5% from launch on 25 February 2025 (98.5 pence) to 31 December 2025 (99.0 pence) and increased by a further 5.8% as at February 2026 to 104.7 pence.

# Achilles Investment Company Limited

## Chair's Statement

For the period from incorporation on 20 January 2025 to 31 December 2025

Achilles Investment Company Limited launched successfully raising £54 million at flotation, exceeding the £50 million target. Admission to trading on the Specialist Fund Segment was on 25 February 2025 at an issue price of 100 pence per share and a starting NAV of 98.5 pence per share.

The Company has two clear objectives. The primary measure of success is delivering strong financial returns for our shareholders. In parallel, the Company targets persistent NAV discounts, and inefficient capital allocation, in London-listed alternative asset investment and asset-backed companies, using active, constructive shareholder engagement to unlock and realise value. The Investment Adviser brings a broader track record of value creation through activism and board involvement, including more than £1.25 billion of shareholder value unlocked over the last three years.

The opportunity that underpinned the launch remains compelling. Many investment companies marketed as low risk have delivered poor returns. Recent launches have been particularly disappointing, often reflecting immature propositions. Issues include misalignment of interests, valuation discipline, fee levels, cost disclosure, capital allocation and governance across; managers, boards and advisers. This has contributed to a prolonged buyers' strike, with many investment companies trading at substantial discounts to their net asset value and shareholders' capital tied up in underperforming and illiquid companies.

Against that backdrop, the Company has focused on areas with strong data and deeper liquidity. The starting point has been listed property and more recently the Company has had its first forays into renewables and infrastructure companies. In the future it is proposed to look at selective opportunities in private equity. With wide discounts across the Company's investable universe, there is an excellent opportunity to deliver significant returns to our shareholders.

The investment policy at flotation was arguably not drawn widely enough to permit investment in certain companies, including some self-managed property companies. These companies share many of the same characteristics of investment companies, including their value being substantially underpinned by investments in real assets, but do not take the legal form of a closed-ended investment company. Following consultation with the Company's adviser, a non-material change was implemented to widen the investible universe. In light of portfolio development, including the investments in Empiric Student Property plc and Spire Healthcare plc, the Board intends to consult shareholders regarding the investment strategy.

As noted in the Company's prospectus, given the Company's size and the effect of liquidity on capital allocation, a return of capital would be considered following the conclusion of a significant campaign. After the successful outcome in Urban Logistics REIT plc, a return of capital was offered to shareholders and universally declined. Once the Company's investment in Spire Healthcare plc reaches greater certainty, the Board expects to revisit a return of capital.

Shareholder support has been central for which the Board and Investment Adviser are very grateful. Engagement has been thoughtful, collaborative, and valuable. The Company remains small, highly focused, and prepared to speak loudly when shareholder value is at stake

Charlotte Denton  
Chair  
27 March 2026

# Achilles Investment Company Limited

## Investment Manager's Report

For the period from incorporation on 20 January 2025 to 31 December 2025

The strategy is built on asset-level work, a detailed understanding of legal and financial considerations, close relationships with other shareholders and disciplined use of cost-effective external advisers to reduce value leakage. The approach is flexible. It stays private and constructive where possible. It escalates through formal shareholder actions and media engagement where needed. Alistair Osborne of The Times has even given the team nicknames, dubbing Christopher "Megaphone" Mills and Robert "Scrappy-Do" Naylor.

A recurring theme is the gap between accounting NAV and realisable value. Fair value accounting through the profit and loss account can look precise. In practice, NAV is often model dependent. Aggressive assumptions, or non-comparable precedent transactions, can overstate NAV. The risk is higher as adviser incentives often favour higher reported values.

Six campaigns were pursued during the period. Five culminated in corporate activity by the investee companies. Spire Healthcare plc and Aquila European Renewables plc are ongoing. Period end NAV performance was weak, with Spire Healthcare plc the principal detractor. Post period end there has been improvement. The NAV as at 28 February 2026 is 104.70 pence, an increase of 6.2 per cent versus the flotation NAV of 98.5 pence.

Portfolio construction is deliberate. Core positions are held where active engagement and escalation are expected to drive outcomes. Incubation and realisation positions are held where stakes are built ahead of potential activism, or where returns are driven by a corporate event.

### Review of activities

#### Completed

##### **Urban Logistics REIT plc ("Urban Logistics")**

Urban Logistics announced an internalisation proposal in March 2025, including initial consideration of £6.8 million and contingent consideration of up to £5.6 million, implying up to £12.4 million in total. When total costs were considered, the economic impact was assessed as materially higher, as much as approximately £32 million. The terms were unattractive. Escalation followed alongside other shareholders, including requisitioning for board change. A recommended cash and share acquisition by LondonMetric was announced on 9 May 2025, providing 0.5612 new LondonMetric shares plus 42.8 pence in cash per Urban Logistics share. On the stated basis, this valued Urban Logistics at 150.3 pence per share, with a 4.4 pence dividend expected prior to completion. Entry at 117.5 pence on 1 March 2025 and the position was sold in July 2025 for 153.3 pence per share gave a return of approximately 31.2 per cent., an IRR of approximately 104.9 per cent, before costs. The Company owned a maximum of 10,000,000 ordinary shares during the period, being 2.12 per cent of Urban Logistic's issued share capital. At the period end, the Company owned no ordinary shares.

##### **Empiric Student Property plc ("Empiric")**

A position was built and engagement prepared in anticipation of corporate activity, with an entry price of 85.4 pence per share in April 2025. Unite Group announced a possible offer in June 2025. A recommended cash and share offer followed in August 2025 for 0.085 New Unite Shares and 32 pence in cash. Based on the prevailing Unite share price, this implied a value of 94.2 pence. The Scheme was approved by shareholders at the General Meeting on 6 October 2025 and became effective in January 2026. However, shortly following approval of the Scheme on 6 October 2025, Empiric issued a trading update on 3 November 2025 which highlighted significant pressures being faced by the company and the wider sector. The share price reaction was severe and as a result the Company realised 77.6 pence per share including dividends just before year end. This gave a return of approximately minus 9.1 per cent., an IRR of approximately minus 14.4 per cent. The trading update reinforced governance concerns around Empiric due to the market communications closely following to shareholder decision points. The Company owned a maximum of 9,150,000 ordinary shares during the period, being 1.38 per cent of Empiric's issued share capital. At the period end, the Company owned no ordinary shares.

## **Investment Manager's Report (continued)**

For the period from incorporation on 20 January 2025 to 31 December 2025

### **Review of activities (continued)**

#### **HICL Infrastructure Company plc ("HICL")**

A position was built in November 2025 after the proposed combination between HICL and The Renewables Infrastructure Group was announced. Shareholder pressure contributed to the proposal being withdrawn in December 2025. Entry at 110.9 pence in November 2025 and sale during December at 119.3 pence inclusive of dividends which gave a return of approximately 7.6 per cent, and an IRR of approximately 166.4 per cent. The Company owned a maximum of 10,000,000 ordinary shares during the period, being 0.49% of HICL's issued share capital. At the period end, the Company owned 2,283,277 ordinary shares.

#### **Life Science REIT plc ("Life Science")**

Engagement included coordination with other shareholders. Robert Naylor joined the board in early November 2025. Post period end, British Land announced a recommended cash and share offer for Life Science, valuing the shares at approximately 42.8 pence per share at announcement. The 31 December 2025 close of 39.4 pence implies only a modest uplift versus the entry price of 38.9 pence. The Company owned a maximum of 13,000,000 ordinary shares during the period, being 3.71% of Life Science's issued share capital. At the period end, the Company owned 13,000,000 ordinary shares.

### **Ongoing**

#### **Spire Healthcare plc ("Spire")**

Spire is not an investment company. It does, however, display features associated with discounted asset-backed situations, including substantial freehold property backing and an undervalued occupational health platform. Spire announced a strategic review in September 2025. Entry at 221.0 pence in July 2025 and 167 pence at 31 December 2025, implies a return of approximately minus 24.4 per cent. Annualised IRR is approximately minus 42.8 per cent, before costs. This was the largest detractor over the period. The outcome of the strategic review is awaited. At the period end, the Company owned 6,000,000 ordinary shares, being 1.49 per cent of Spire's issued share capital.

#### **Aquila European Renewables plc ("Aquila")**

Robert Naylor joined the board as chairman in November 2025. The investment thesis has been supported by the Company's managed wind down and realisation programme. In January 2026, Aquila announced the first distribution under its B share scheme, equivalent to 9 cents per ordinary share, and in March the second distribution of 5.4 cents. As any managed wind down it is usual for the most attractive assets to be divested first. Entry at 34.3 cents on 1 October 2025 and a price of 36.5 cents at 31 December 2025 implies a return of approximately 6.4 per cent., an IRR of approximately 28.3 per cent. At the period end, the Company owned 5,110,000 ordinary shares, being 1.25% of Aquila's issued share capital.

## **Investment Manager's Report (continued)**

For the period from incorporation on 20 January 2025 to 31 December 2025

### **Review of activities (continued)**

#### **Challenges**

Execution in smaller, less liquid companies can move the market when positions are built, entry levels can be affected. Campaigns demand material time, energy, and coordination across legal, advisory, and shareholder workstreams. As a result, the Company can only undertake a certain number of campaigns at any one time to deliver returns for shareholders. This means we must hold a concentrated portfolio which can require elevated cash while catalysts develop, returns can be dampened during strong markets.

#### **Conclusion**

The opportunity to unlock trapped value across London-listed alternative assets remains significant. Alternative asset investment companies are currently trading at an average discount of approximately 26 per cent, being approximately a £14 billion gap between market capitalisations and underlying asset values. The structure is intentionally focused and simple. It is designed to complement, not replicate, shareholder portfolios. Stronger governance and better alignment should narrow discounts. Over time, that can reinforce confidence, improve capital allocation, and drive better outcomes for shareholders.

# Achilles Investment Company Limited

## Board Members

For the period from incorporation on 20 January 2025 to 31 December 2025

The Board is responsible for the determination of the Company's investment policy and strategy and has overall responsibility for the Company's activities, including the review of investment activity and performance and the control and supervision of the Company's service providers. The Directors, led by the Chair, are also responsible for ensuring effective engagement with, and encouraging participation from, the Company's shareholders and stakeholders.

All of the Directors are non-executive and independent of the Investment Manager. The Directors meet at least four times a year, and at such other times as may be required, to review and assess, inter alia, the Company's investment policy and strategy, the Company's risk profile, investment performance, the performance of the Company's service providers (including the Investment Manager and the Administrator), and generally to supervise the conduct of the Company's affairs.

The Board has been assembled to ensure that the Company has the appropriate breadth of skills and experience in order to ensure that it can be governed effectively and, as at 31 December 2025 and to date, comprises the following persons:

### **Charlotte Denton (Independent Non-Executive Chair)**

Charlotte is a Fellow of the Institute of Chartered Accountants in England and Wales and holds a degree in politics from Durham University. She is also a Chartered Director and a fellow of the Institute of Directors. She has served on boards for over twenty years and is currently a non-executive director of various entities including the GP boards of Private Equity group Hitec, the investment management company for Next Energy and the holding company for Alpha Real Capital. She is also on the board of the FTSE 100 company Pershing Square Holding Limited. During Charlotte's executive career she worked in various locations through roles in diverse organisations, including KPMG, Rothschild, Northern Trust, a property development startup and a privately held financial services group.

### **Helen Green (Chair of the Audit Committee) (Independent Non-Executive Director)**

Helen has served on investment company boards for nearly twenty years. She is currently the Audit Chair of JPMorgan Global Core Real Assets Limited, Golden Prospect Precious Metals Limited and Landore Resources Limited among other non-executive directorships at various entities including the holding company of Alpha Real Capital. Helen's previous non-executive directorships include CQS Natural Resources Growth and Income Company plc, UK Mortgages Limited and John Laing Infrastructure Fund Limited through which she has extensive experience as a non-executive director, including in the role of Audit and/or Risk Committee Chair and Board Chair. Helen has worked for Saffery since 1984 and was a partner in the London office from 1998 until 2000 before she relocated to Guernsey and became a director of Saffery Trust Guernsey. Helen is a Fellow of the Institute of Chartered Accountants in England and Wales, a member of the Institute of Directors and a member of the Society of Trust and Estate Practitioners.

## Achilles Investment Company Limited

### Board Members (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

#### **Brett Miller (Independent Non-Executive Director)**

Brett has wide-ranging investment company experience, particularly in the restructuring and managed runoff of a number of listed closed ended funds across a range of asset classes, delivering value to shareholders. He has been involved (as executive and non-executive director) in the management of numerous London Stock Exchange and AIM-listed closed ended funds. He currently serves as a non-executive director of Manchester & London Investment Trust plc and Ecofin U.S. Renewables Infrastructure Trust plc, both of which are London-listed, among a number of directorships of unlisted and/or private companies. In addition, he has initiated investments in or represented institutional investors (activist and long only) in a number of London Stock Exchange or AIM listed companies where he subsequently orchestrated the restructuring of such funds, including most recently SLF Realisation Fund Limited (formerly KKV Secured Loan Fund Limited). Brett graduated from the University of Witwatersrand (South Africa) with a bachelor's degree majoring in law and economics and also holds a law degree from the London School of Economics.

# Achilles Investment Company Limited

## Interim Management Report

For the period from incorporation on 20 January 2025 to 31 December 2025

A description of important events that have occurred during the period from incorporation on 20 January 2025 to 31 December 2025, their impact on the Unaudited Condensed Interim Financial Statements and a description of the principal risks and uncertainties facing the Company, together with an indication of important events which have occurred since the end of the period under review and which are likely to affect the Company's future development are included within the Chair's Statement, the Investment Manager's Report and the notes to the Unaudited Condensed Interim Financial Statements contained on pages 17 to 23 and are incorporated herein by reference.

There were no other events or changes in the related parties and transactions with those parties during the period under review which had, or could have had, a material impact on the financial position and performance of the Company, other than those disclosed in the Unaudited Condensed Interim Financial Statements.

### Principal Risks and Uncertainties

The Directors have performed a robust assessment of the Company's principal and emerging risks. The Board has undertaken a review of these risks during the period and has developed and maintained a risk matrix, which identifies the key risks that the Company faces. In evaluating these risks, particular attention has been given to those that may affect the Company's viability.

Principal risk	Description	Mitigation
The Investment Manager does not meet Board, or shareholder, expectations	<p>The history of engagement by the Investment Manager's investment professionals with respect to previous investments is not indicative of the Company's future performance or ability to improve the share performance of any portfolio companies.</p> <p>There may be extended periods where the assets of the Company are not fully invested.</p>	<p>The Board performs an annual performance review of the Investment Manager (who can be given 6 months notice) and, if necessary, would consider a possible replacement. A well-defined investment strategy/policy and investment process has been established. The Investment Manager has regular dialogue with shareholders and shareholders can and do approach the Board to discuss issues.</p> <p>Uninvested cash is kept in a money market fund and there is a redemption mechanism in place to return capital to investors after consultation.</p>
Investment strategy may not succeed	<p>There can be no assurance that the Company's investment strategy will be successful or that it will result in price appreciation of the relevant portfolio companies' shares and, by extension, the Ordinary Shares.</p>	<p>Proven expertise of Investment Manager and the ability to adapt the investment approach.</p>
Portfolio concentration	<p>The value of the Company's portfolio will be dominated by a limited number of assets which may be operating in only one or two sub-sectors of the investment company market.</p>	<p>The Board has acknowledged the risk in the investment policy and have disclosed this risk to shareholders. The Investment Manager performs daily monitoring of the portfolio.</p>

## Interim Management Report

For the period from incorporation on 20 January 2025 to 31 December 2025

### Principal Risks and Uncertainties (continued)

Principal risk (continued)	Description (continued)	Mitigation (continued)
Key person risk in Investment Manager	The Company depends on the diligence, skill and business contacts of the Investment Manager’s key investment professionals. The Company’s future success depends on the continued service of these individuals, who are not obligated to remain employed, or involved with, or engaged by the Investment Manager.	The Investment Manager is expected to maintain team continuity. Key people are incentivised within the Investment Manager. There are two named investment managers.
Cyber risk	The Company's Service Providers do not have adequate cyber-attack prevention policies, business continuity plans and disaster recovery processes.	The Board performs an annual review of Service Providers business continuity plans and cyber policies and requests external control reports if available.

The Board takes appropriate steps to manage risks, including ensuring that the Company complies with the investment restrictions provided for in the Prospectus.

The Company has engaged Harwood Capital Management (Gibraltar) Limited (“HCM”) as its alternative fund manager (“AIFM”) to provide portfolio and risk management services to the Company. The Board agrees the strategy for the Company, approves the Company’s risk appetite and, together with the AIFM, monitors the risk profile of the Company. The Board and AIFM maintains a risk management process to identify, monitor and control risk concentration.

## **Interim Management Report**

For the period from incorporation on 20 January 2025 to 31 December 2025

### **Going Concern**

The Directors have adopted the going concern basis in preparing the Unaudited Condensed Interim Financial Statements.

In assessing the going concern basis of accounting, the Directors have assessed the guidance issued by the Financial Reporting Council and considered the Company's own financial position, recent market volatility, the on-going impact of the Russian war on Ukraine and the conflict in the Middle East, increases in tariffs, inflation, interest rates and other uncertainties impacting on the Company's investments.

At period end the Company had a net asset position of £53,448,000, comprising cash of £16,295,000, and listed investments of £37,239,000.

The Directors ensure it has adequate liquidity by regularly reviewing its financial position and forward-looking liquidity requirements. In assessing its going concern status, the Directors have considered the level of operating expenses relative to net assets, such expenses approximating to 2% of net assets as at 31 December 2025.

### **Related party transactions**

Details of related party transactions are given in note 12 to the Unaudited Condensed Interim Financial Statements.

Helen Green  
27 March 2026

## **Responsibility Statement**

For the period from incorporation on 20 January 2025 to 31 December 2025

The Directors confirm that to the best of their knowledge:

- the Unaudited Condensed Interim Financial Statements have been prepared in accordance with IAS 34 Interim Financial Reporting;
- the Interim Report (which includes the Company Overview, Chair’s Statement, Investment Manager’s Report, Board Members and Interim Management Report) includes a true and fair review of the information required by:
  - (a) DGTR 4.2.7R of the Disclosure Guidance and Transparency Rules, being an indication of important events that have occurred during the first six months of the financial year and their impact on the condensed set of financial statements, and a description of the principal risks and uncertainties for the remaining six months of the financial year; and
  - (b) DGTR 4.2.8R of the Disclosure Guidance and Transparency Rules, being related party transactions that have taken place in the first six months of the current financial year and that have materially affected the financial position or the performance of the enterprise during that period.

The Directors are responsible for the maintenance and integrity of the corporate and financial information included on the Company’s website, and for the preparation and dissemination of financial statements. Legislation in Guernsey governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Signed on behalf of the Board of Directors of the Company on 27 March 2026.

Helen Green

## Achilles Investment Company Limited

### Unaudited Condensed Statement of Comprehensive Income

For the period from incorporation on 20 January 2025 to 31 December 2025

	Notes	Period from 20 January 2025 31 December 2025 (unaudited) £'000
<b>Investments</b>		
Net loss on financial assets at FVTPL		(628)
Other income – investment related		758
Transaction costs		(375)
<b>Net investment (loss)</b>		<b>(245)</b>
Interest income		78
Dividend income		1,165
<b>Total income</b>		<b>1,243</b>
Management fees	5	(478)
Other expenses	6	(1,072)
<b>Total (loss) and comprehensive (loss) for the period</b>		<b>(552)</b>
<b>(Loss) per Ordinary Share (pence)</b>	7	<b>(1.02)</b>

All items in the above statement derive from continuing operations.

The notes on pages 17 to 23 form an integral part of these Unaudited Condensed Interim Financial Statements.

# Achilles Investment Company Limited

## Unaudited Condensed Statement of Financial Position

For the period from incorporation on 20 January 2025 to 31 December 2025

	Notes	31 December 2025 £'000 (unaudited)
<b>Non-current assets</b>		
Financial assets held at fair value through profit or loss	8	37,239
<b>Current assets</b>		
Dividends receivable		12
Cash and cash equivalents		16,295
Other receivables		52
		<hr/>
		16,359
<b>Total assets</b>		<hr/> <b>53,598</b> <hr/>
<b>Current liabilities</b>		
Management fee payable	5	(92)
Other payables		(58)
		<hr/>
<b>Total liabilities</b>		<b>(150)</b> <hr/>
<b>Net assets</b>		<hr/> <b>53,448</b> <hr/>
<b>Equity</b>		
Share Capital	9	54,000
Revenue reserve		(552)
		<hr/>
<b>Total equity</b>		<b>53,448</b> <hr/>
<b>Net Asset Value per Ordinary Share (pence)</b>	10	98.98

Approved by the Board of Directors and authorised for issue on 27 March 2026 and signed on their behalf:

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Helen Green

The notes on pages 17 to 23 form an integral part of these Unaudited Condensed Interim Financial Statements.

## Achilles Investment Company Limited

### Unaudited Condensed Statement of Changes in Equity

For the period from incorporation on 20 January 2025 to 31 December 2025

	Notes	Share capital £'000	Reserves £'000	Total £'000
<b>For the period 20 January to 31 December 2025 (unaudited)</b>				
At 20 January 2025		-	-	-
Share issue	9	54,000	-	54,000
Total comprehensive (loss) for the period			(552)	(552)
<b>At 31 December 2025</b>		<b>54,000</b>	<b>(552)</b>	<b>53,448</b>

The notes on pages 17 to 23 form an integral part of these Unaudited Condensed Interim Financial Statements.

## Unaudited Condensed Statement of Cash Flows

For the period from incorporation on 20 January 2025 to 31 December 2025

	Notes	Period from 20 January 2025 to 31 December 2025 £'000 (unaudited)
<b>Cash flows from operating activities</b>		
Operating loss		(552)
Net losses on financial assets at FVTPL	8	628
Increase in receivables		(64)
Increase in payables		150
		<hr/>
<b>Net cash flow used in operating activities</b>		<b>162</b>
		<hr/>
<b>Cash flows from investing activities</b>		
Purchase of investments	8	(108,229)
Sale of investments	8	70,362
		<hr/>
<b>Net cash flow used in investing activities</b>		<b>(37,867)</b>
		<hr/>
<b>Cash flows from financing activities</b>		
Proceeds from issue of Ordinary Shares	9	54,000
		<hr/>
<b>Net cash flow from financing activities</b>		<b>54,000</b>
		<hr/>
<b>Increase in cash and cash equivalents</b>		<b>16,295</b>
Cash and cash equivalents at beginning of period		-
		<hr/>
<b>Cash and cash equivalents at end of period</b>		<b>16,295</b>
		<hr/> <hr/>

The notes on pages 17 to 23 form an integral part of these Unaudited Condensed Interim Financial Statements.

## Notes to the Unaudited Condensed Interim Financial Statements

For the period from incorporation on 20 January 2025 to 31 December 2025

### 1. Reporting Entity

Achilles Investment Company Limited (the “Company”) is registered in Guernsey and was formed on 20 January 2025, with registered number 75109. The Company’s registered office is Les Echelons Court, Les Echelons, St Peter Port, Guernsey, GY1 1AR.

The Company is a Registered Closed-ended Collective Investment Scheme regulated by the Guernsey Financial Services Commission (“GFSC”), with reference number 3082907, pursuant to the Protection of Investors (Bailiwick of Guernsey) Law 2020, as amended and the Registered Collective Investment Scheme Rules and Guidance, 2021.

The Company had 54,000,000 shares in issue under ticker AIC, SEDOL BT3GKD0 and ISIN GG00BT3GKD08 on 31 December 2025. The Unaudited Condensed Interim Financial Statements of the Company are presented for the period ended 31 December 2025.

The Company received discretionary management services directly from Harwood Capital Management (Gibraltar) Limited (“HCM”) acting as the Investment Managers and the Alternative Investment Fund Manager during the period 20 January to 31 December 2025.

### 2. Material accounting policies

#### (a) Basis of accounting

The Unaudited Condensed Interim Financial Statements have been prepared on a going concern basis in accordance with IAS 34 Interim Financial Reporting as adopted by the European Union, and applicable Guernsey law. These Unaudited Condensed Interim Financial Statements do not comprise statutory Financial Statements within the meaning of the Companies (Guernsey) Law, 2008, they do not include all of the information required for full annual financial statements. As this is the Company’s first set of interim financial statements since incorporation, there are no prior annual financial statements with which these interim financial statements can be read.

Where presentational guidance set out in the Statement of Recommended Practice (“SORP”) for investment companies issued by the Association of Investment Companies (“AIC”) updated in July 2022 is consistent with the requirements of IFRS, the Directors have sought to prepare the Unaudited Condensed Interim Financial Statements on a basis compliant with the recommendations of the SORP.

#### (b) Going concern

The Directors have adopted the going concern basis in preparing the Unaudited Condensed Interim Financial Statements.

In assessing the going concern basis of accounting, the Directors have assessed the guidance issued by the Financial Reporting Council and considered the Company’s own financial position, recent market volatility, the on-going impact of the Russian war on Ukraine and the conflict in the Middle East, increases in tariffs, inflation, interest rates and other uncertainties impacting on the financial position and liquidity requirements of the Company’s investments.

At period end the Company had a net asset position of £53,448,000, comprising cash of £16,295,000, and listed investments of £37,239,000.

## Notes to the Unaudited Condensed Interim Financial Statements (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### 2. Material accounting policies (continued)

#### (b) Going concern (continued)

The Directors ensure it has adequate liquidity by regularly reviewing its financial position and forward-looking liquidity requirements. In assessing its going concern status, the Directors have considered the level of operating expenses relative to net assets, such expenses approximating to 2% of net assets as at 31 December 2025.

#### (c) Segmental reporting

The chief operating decision maker is the Board of Directors. The Directors are of the opinion that the Company is engaged in a single segment of business with the primary objective of investing in securities to generate capital growth for shareholders. Consequently, no business segmental analysis is provided.

The key measure of performance used by the Board is the Net Asset Value of the Company (which is calculated under IFRS). Therefore, no reconciliation is required between the measure of profit or loss used by the Board and that contained in these Unaudited Condensed Interim Financial Statements.

#### (d) Taxation

The Company has been granted exemption from liability to income tax in Guernsey under the Income Tax (Exempt Bodies) (Guernsey) Ordinance, 1989 amended by the Director of Income Tax in Guernsey for the current period. Exemption is applied for and granted annually and is subject to the payment of a fee which was £1,600 for the period.

#### (e) Investment entities

In accordance with IFRS 10 an investment entity is an entity that:

- Obtains funds from one or more investors for the purpose of providing those investor(s) with investment management services;
- commits to its investor(s) that its business purpose is to invest funds solely for returns from capital application, investment income, or both; and
- measures and evaluates the performance of substantially all of its investments on a fair value basis.

The Directors are satisfied that the Company meets each of these criteria and hence is an investment entity in accordance with IFRS 10.

### 3. Use of estimates and critical judgements

The preparation of Unaudited Condensed Interim Financial Statements in accordance with IFRS requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the Unaudited Condensed Interim Financial Statements and the reported amounts of income and expenses during the period. Actual results could differ from those estimates and assumptions.

The estimates and underlying assumptions are reviewed on an ongoing basis. There were no significant accounting estimates or significant judgements in the current period.

## Notes to the Unaudited Condensed Interim Financial Statements (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### 4. New and revised standards

#### *New standards and interpretations not yet adopted*

Certain new accounting standards, amendments to accounting standards and interpretations have been published that are not mandatory for current period and have not been early adopted by the Company.

#### *Standards, amendments and interpretations effective during the period*

There are no standards, amendments to standards or interpretations that are effective for annual periods beginning on 1 January 2025 that have a material effect on the financial statements of the Company.

### 5. Management fees

	<b>20 January to 31 December 2025</b>
	<b>2025 £'000</b>
Management fees	478
<b>Total management fees</b>	<b>478</b>

The Company procures management services directly from HCM, under the Investment Management Agreement.

#### **Management fee**

The Management Fee is equal to 1% per annum of the lower of (i) the Net Asset Value (but excluding any accruals for Management Fee); and (ii) the Average Market Capitalisation. The Management Fee is calculated and paid monthly in arrears.

As at 31 December 2025, an amount of £92,000 was outstanding in respect of Management Fees.

## Notes to the Unaudited Condensed Interim Financial Statements (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### 6. Other expenses

	20 January to 31 December 2025		
	Non-recurring expenses	Recurring expenses	Total
	£'000	£'000	£'000
Broker and transaction fees	463	30	493
Legal fee and professional fees	202	30	232
Listing fees	128	5	133
Administration fee	10	66	76
Directors' fees	-	55	55
Other expenses	-	27	27
Audit fees	-	25	25
Registrar fees	-	12	12
Regulatory fees	7	4	11
Custodian fees	-	8	8
<b>Total other expenses</b>	<b>810</b>	<b>262</b>	<b>1,072</b>

### 7. (Loss) per Ordinary Share

	31 December 2025
Loss for the period (£'000)	(552)
Weighted average number of shares in issue	54,000,000
<b>Basic (loss) per Ordinary Share (pence)</b>	<b>(1.02)</b>

**Notes to the Unaudited Condensed Interim Financial Statements (continued)**

For the period from incorporation on 20 January 2025 to 31 December 2025

**8. Financial assets at fair value through profit or loss**

	<b>31 December 2025 £'000</b>
Opening balance	-
Purchases	108,229
Return of capital	(70,362)
Net (losses) for the year	(628)
Financial assets held at FVTPL	<u><u>37,239</u></u>

**9. Share capital**

	<b>No of shares</b>	<b>31 December 2025 £'000</b>
<b>Ordinary Shares at no par value</b>		
Opening balance as at 20 January 2025	-	-
Issue of shares	54,000,000	54,000
<b>At 31 December 2025</b>	<u><u>54,000,000</u></u>	<u><u>54,000</u></u>

The holders of Ordinary Shares have the right to receive notice of and attend, speak and vote in general meetings of the Company. They are also entitled to participate in any dividends and other distributions of the Company.

**10. Net Asset Value per Ordinary Share**

The Net Asset Value per Ordinary Share and the Net Asset Value at the period end calculated in accordance with the Articles of Incorporation were as follows:

	<b>31 December 2025</b>	
	<b>NAV per share pence</b>	<b>NAV attributable £'000</b>
<b>Ordinary Shares: basic and diluted</b>	<u><u>98.98</u></u>	<u><u>53,448</u></u>

The Net Asset Value per Ordinary Share is based on 54,000,000 Ordinary Shares, being the number of Ordinary Shares in issue at the period end.

## Notes to the Unaudited Condensed Interim Financial Statements (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### 11. Financial instruments and capital disclosures

The Company's activities expose it to a variety of financial risks; market risk (which includes price risk, foreign currency risk and interest rate risk), credit risk and liquidity risk. The Unaudited Condensed Interim Financial Statements do not include all financial risk management information and disclosures required in the annual financial statements. Additionally, there are no prior audited financial statements with which these interim financial statements may be compared.

The Company measures fair values using the following hierarchy that reflects the significance of the inputs used in making the measurements. Categorisation within the hierarchy has been determined on the basis of the lowest level input that is significant to the fair value measurement of the relevant assets as follows:

Level 1 – Quoted prices (unadjusted) in active markets for identical assets or liabilities.

An active market is a market in which transactions for the asset or liability occur with sufficient frequency and volume on an ongoing basis such that quoted prices reflect prices at which an orderly transaction would take place between market participants at the measurement date. Quoted prices provided by external pricing services, brokers and vendors are included in Level 1, if they reflect actual and regularly occurring market transactions on an arm's-length basis.

Level 2 – Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices).

Level 2 inputs include the following:

- quoted prices for similar (i.e., not identical) assets in active markets;
- quoted prices for identical or similar assets or liabilities in markets that are not active. Characteristics of an inactive market include a significant decline in the volume and level of trading activity, the available prices vary significantly over time or among market participants or the prices are not current;
- inputs other than quoted prices that are observable for the asset (for example, interest rates and yield curves observable at commonly quoted intervals); and
- inputs that are derived principally from, or corroborated by, observable market data by correlation or other means (market-corroborated inputs).

Level 3 – Inputs for the asset or liability that are not based on observable market data (unobservable inputs).

The level in the fair value hierarchy within which the fair value measurement is categorised in its entirety is determined on the basis of the lowest level input that is significant to the fair value measurement in its entirety. If a fair value measurement uses observable inputs that require significant adjustment based on unobservable inputs, that measurement is a Level 3 measurement. Assessing the significance of a particular input to the fair value measurement in its entirety requires judgement, considering factors specific to the asset or liability.

At 31 December 2025	Level 1 £'000	Level 2 £'000	Level 3 £'000	Total £'000
Financial assets at FVTPL	37,239	-	-	37,239
	<b>37,239</b>	<b>-</b>	<b>-</b>	<b>37,239</b>

The Company has exposure to level 1 instruments in the current period.

## Notes to the Unaudited Condensed Interim Financial Statements (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### 12. Related parties

HCM provides investment management services for the Company.

	20 January to 31 December 2025 £'000
<b>Management fees</b>	
Total Management Fee charged	487
Management fee outstanding	92
<b>Directors' fees</b>	
Total Directors' fees charged	55
Directors' fees outstanding	-

As at 31 December 2025 the following Directors have holdings in the Company:

Director	Number of Ordinary Shares	% Ordinary Shares in issue as at 31 December 2025
Charlotte Denton	25,000	0.05%
Helen Green	10,000	0.02%
Brett Miller	35,000	0.06%

### 13. Subsequent events

There has not been any matter or circumstance occurring subsequent to the end of the interim financial period that has significantly affected, or may significantly affect, the operations of the Company, the results of those operations, or the state of affairs of the Company in future financial periods.

# Achilles Investment Company Limited

## Corporate Information

For the period from incorporation on 20 January 2025 to 31 December 2025

### Directors

Charlotte Denton, Chair  
Helen Green  
Brett Miller

### Registered office

Les Echelons Court  
Les Echelons  
St Peter Port  
Guernsey  
GY1 1AR

### AIFM and Investment Manager

Harwood Capital Management (Gibraltar) Limited  
Suite 23  
Portland House  
Glacis Road  
Gibraltar  
GX11 1AA

### Administrator and Company Secretary

NSM Funds Limited  
Les Echelons Court  
Les Echelons  
St Peter Port  
Guernsey  
GY1 1AR

### Financial Adviser and Sole Bookrunner

Singer Capital Markets Securities Limited  
1 Bartholomew Lane  
London  
EC2N 2AX

### Legal Advisers to the Company as to English law

Gowling WLG (UK) LLP  
4 More London  
Riverside  
London  
SE1 2AU

### Legal Advisers to the Company as to Guernsey law

Carey Olsen (Guernsey) LLP  
Carey House  
Les Banques  
Guernsey  
GY1 4BZ

# Achilles Investment Company Limited

## Corporate Information (continued)

For the period from incorporation on 20 January 2025 to 31 December 2025

### **Solicitors to the Financial Adviser and Sole Bookrunner**

Stephenson Harwood LLP  
1 Finsbury Circus  
London  
EC2M 7SH

### **Custodian**

Butterfield Bank (Guernsey) Limited  
Glatigny Esplanade  
St Peter Port  
Guernsey  
GY1 3AP

### **Registrar**

MUFG Corporate Markets (Guernsey) Limited  
Mont Crevelt House  
Bulwer Avenue  
St Sampson  
Guernsey  
GY2 4LH

### **Independent Auditor**

Baker Tilly CI Audit Limited  
Mont Crevelt House  
Bulwer Avenue  
St Sampson  
Guernsey  
GY2 3US