For the quarter ended 31 March 2021

This fund update was first made publicly available on 3 May 2021

DEVON ALPHA FUND

What is the purpose of this update?

This document tells you how the Devon Alpha Fund has performed and what fees were charged. The document will help you to compare the fund with other funds. Devon Funds Management Limited prepared this update in accordance with the Financial Markets Conduct Act 2013. This information is not audited and may be updated.

Description of this fund

The Alpha Fund is a concentrated portfolio of approximately 10 - 15 select companies on the New Zealand and Australian share markets. The Alpha Fund does not follow an equity index and is actively managed. When appropriate investment opportunities cannot be identified, the Alpha Fund may hold cash or cash equivalent securities. The Alpha Fund aims to generate capital growth over the long term.

Total value of the fund	\$110,926,039.08
Date the fund started	3 June 2010

What are the risks of investing?

Risk indicator for the Devon Alpha Fund:



The risk indicator is rated from 1 (low) to 7 (high). The rating reflects how much the value of the fund's assets goes up and down. A higher risk generally means higher potential returns over time, but more ups and downs along the way.

To help you clarify your own attitude to risk, you can seek financial advice or work out your risk profile at www.sorted.org.nz/tools/investor-kickstarter.

Note that even the lowest category does not mean a risk-free investment, and there are other risks that are not captured by this rating.

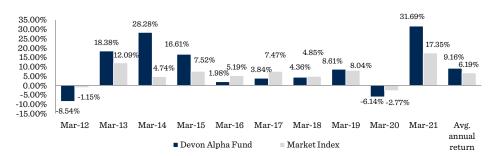
This risk indicator is not a guarantee of a fund's future performance. The risk indicator is based on the returns data for the five year period to 31 March 2021. While risk indicators are usually relatively stable, they do shift from time to time. The risk indicator will continue to be updated in future fund updates.

See the $\underline{Product\ Disclosure\ Statement\ (PDS)}$ for more information about the risks associated with investing in this fund.

How has the fund performed? ¹	Avg. over past 5 Years	Past Year
Annual Fund Return (after deduction for fund fees and tax)	7.79%	31.69%
Annual Fund Return (after deduction for fund fees but before tax	8.15%	30.39%
Market index* annual return (reflects no deduction for charges and tax)	6.79%	17.35%

*The Market Index return is for indicative purposes only. The Devon Alpha Fund is an actively managed absolute return fund that does not track an equity index. The market index is based on 50% of the 90 day bank bill returns and 50% of the 50:50 S&P/NZX50 Gross Index and the S&P/ASX200 Gross Accumulation Index. For details on the calculation of the Market Index Return please refer to www.companiesoffice.govt.nz/disclose ¹Please refer to Further Information on the bottom of page 2. Additional information about the market index is available on the offer register.

Annual return graph²



This shows the return after fund charges and tax for each year ending 31 March for the last 10 completed years. The last bar shows the average annual return for the last 10 completed years, up to 31 March 2021 Important: This does not tell you how the fund will perform in the future. Returns in this update are after tax at the highest prescribed investor rate (PIR) of tax for an individual New Zealand resident. Your tax may be lower.

What fees are investors charged?3

Investors in the Devon Alpha Fund are charged fund charges. In the year to $31\,\mathrm{March}\ 2021$ these were:

% of Net Asset Value

Total Fund Charges	5.34%
Comprising of the below management, administration and performance charges:	
Manager's basic fee:	1.00%
Other management and administration charges:	0.25%
Performance fees (if applicable):	4.09%

Investors are not charged individual action fees for specific actions or decisions (for example, for withdrawing from or switching funds). See the PDS for more information about those fees.

Example of how this applies to an investor

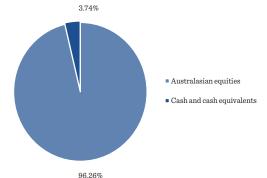
Small differences in fees and charges can have a big impact on your investment over the long term.

Chris had \$10,000 in the Devon Alpha Fund at the start of the year and did not make any further contributions. At the end of the year, Chris received a return after fund charges were deducted of \$3039 (that is 30.39% of his initial \$10,000). Chris does not pay any other charges. This gives Chris a total return after tax of \$3169 for the year.

What does the fund invest in?

The chart (below) shows the types of assets that the Devon Alpha Fund invests in.

Actual investment mix



The Fund's currency exposure is actively managed. The portfolio is currently 69.98% hedged against its AUD exposure.

Target investment mix

Asset Sector	Range %
Cash and cash equivalents	0 - 100
Australasian equities	0 - 100
International equities	0
New Zealand fixed interest	0
Other	0

Top 10 investments

Asset name	% of fund net assets	Туре	Country	Credit rating
Ramsay Health Care Ltd	7.48%	Cash and cash equivalents	AU	
Fisher & Paykel Healthcare Ltd	7.28%	Australasian equities	NZ	
Contact Energy Ltd	7.25%	Australasian equities	NZ	
Ebos Group Ltd	7.17%	7.17% Australasian equities		
Sydney Airports	7.14%	Australasian equities		
Macquarie Group Ltd	6.41%	Australasian equities	AU	
Aristocrat Leisure Ltd	6.27%	Australasian equities	AU	
National Australia Bank Ltd	6.17%	Australasian equities	AU	
Fletcher Building Ltd	6.09%	Australasian equities	NZ	
CSL Limited	5.35%	Australasian equities	AU	

The top 10 investments make up 66.62% of the net asset value of the Fund.

Key personnel

Name	Current position	Time in current position	Previous position	Time in previous position
Slade Robertson	Managing Director, Devon Funds Management	4 years, 2 months	Portfolio Manager, Devon Funds Management	6 years, 10 months
Tama Willis	Portfolio Manager, Devon Funds Management	8 years, 9 months	Investment Analyst, GIC Asset Management	2 years, 0 months
Chris Gaskin	Portfolio Manager, Devon Funds Management	11 years, 0 months	Portfolio Manager, Brook Asset Management	4 years, 2 months
Mark Brown	Chief Investment Officer, Devon Funds Management	3 years, 3 months	Head of Equities, ANZ	6 years, 0 months

Further information

 $You can also obtain this information, the PDS for the Devon Funds, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and some additional information from the offer register at \underline{www.business.govt.nz/disclose}, and \underline{www.busines$

Notes

(1) After tax performance assumes an investor is taxed at the highest Prescribed Investor Rate of 28%. (2) Fund returns are after deduction of fees. (3) Fund fees are charged as a percentage of an investor's interest in the Fund. (4) For more information on performance fees, please refer to the PDS found at www.devonfunds.co.nz or www.companiesoffice.govt.nz/disclose