

Expat Bulgaria SOFIX UCITS ETF

Annual Report on the Activity
Independent Auditor's Report
Financial Statements
31.12.2017

expatcapital

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2017 ANNUAL REPORT ON THE ACTIVITY OF EXPAT BULGARIA SOFIX UCITS ETF

Expat Bulgaria SOFIX UCITS ETF is a collective open-ended investment scheme for investing in securities and other liquid financial assets established and operating in accordance with the Collective investment schemes and other undertakings for collective investment Act (ACISOCIVA), the Public Offering of Securities Act (POSA) and the regulations for its implementation, the Markets in Financial Instruments Act (MFIA), the Law on obligations and contracts (LOC) and the other applicable laws of the Republic of Bulgaria.

The ETF is a designated asset pool for investment in securities and other liquid financial assets in view of achieving the investment objectives.

The ETF is a designated asset pool for the purpose of collective investment of funds raised through public offering of shares in transferable securities and other liquid financial assets under Art. 38, para 1 of the ACISOCIVA, carried out by the Management Company on the principle of risk spreading.

The ETF is organised and managed by the management company “Expat Asset Management” EAD (hereinafter referred to as the Management Company, or MC) under ACISOCIVA and the regulations for its implementation, the Law on obligations and contracts and the other applicable laws of the Republic of Bulgaria.

The Management Company is authorised to organise and manage the Fund under para 1 by the Financial Supervision Commission with authorisation No.156-DF dated 23 August 2016.

During the reporting period the Fund did not witness internal events that might have affected its operations or the performance of the ETF, as well as the one of the Management Company. After the reporting period had ended and as of the composition date of this reporting document, there are neither essential corporate events occurred, nor actions on the occasion of research and development activity. Expat Bulgaria SOFIX UCITS ETF has no branches.

Expat Bulgaria SOFIX UCITS ETF is a passively-managed exchange-traded fund which follows the model of full physical replication of the SOFIX index calculated by the Bulgarian Stock Exchange – Sofia. In order to reach the highest possible correlation with the performance of the Reference Index, the Fund will invest mainly in a basket of balance-sheet assets consisting of shares of the companies in the Reference Index. As a Fund for direct replication, Expat Bulgaria SOFIX UCITS ETF may not invest in every company of the Reference Index or with the exact weight of the given company in the Reference Index. Under normal market conditions, the ETF shall invest in every constituent of the Reference Index with weights as close as possible to those in the Index and subject to the regulatory limits and restrictions.

Fund Net Asset Value Allocation

The Fund’s net asset value cannot be less than 500 000 BGN. This minimal amount should be reached in two years after acquiring management and operating license from the Financial Supervision Commission.

As of 31.12.2017 Expat Bulgaria SOFIX UCITS ETF’s total asset value was estimated at BGN 31 116 896, decomposed in 94.89% invested in company shares traded on BSE – Sofia and 5.11% as cash equivalents in multiple accounts. The total number of units in issue was 25 400 000.

Risk Profile

The risk profile of the Fund represents the amount and type of risk that the Management Company undertakes by investing the assets of the Fund, while seeking to replicate the Reference Index, which at the date of this report is an index of shares traded on BSE-Sofia. In this respect, investing

in units of Expat Bulgaria SOFIX UCITS ETF involves undertaking high risk, given that the Reference Index is composed of equities.

In its activity, Expat Bulgaria SOFIX UCITS ETF is exposed to various types of risks affecting its results. The main risks that investors face when they invest in units of Expat Bulgaria SOFIX UCITS ETF are:

Market risk

The possibility of loss occurring due to adverse changes in the securities prices, market interest rates, exchange rates and other. This market risk affects the net asset value of the ETF which will also fluctuate as a result of changes in the market prices of the equities and other securities in which the ETF has invested.

Extreme market movements

The market price of the financial instruments in which the Fund invests may fluctuate due to changes in the economic and market environment, the monetary policy of the central banks, the business activity of the issuers, the industry in which the issuer operates and the demand and supply on the stock market. At certain times, the market price of the Fund units on the stock exchange may fluctuate substantially. In the event of significant movements of the Index incl. large daily movements, the performance of the Fund may depart from its investment objectives. The valuation of the Fund will fluctuate as a result of changes in the price of the Fund's assets and the Reference Index.

Inability of the Management Company to adapt to market changes

The fund follows a passive investment strategy, i.e. it is not actively managed. As a result, the Management Company will not change the composition of the portfolio, except to follow closely the total return of the Reference Index. The Fund is not trying to outperform the market and does not take defensive positions when the market falls or is considered overvalued. Therefore, a decline in the Reference Index may lead to a decline in the value of the Fund's assets.

Liquidity risk

The risk associated with the possibility of losses or missed profits by mandatory or forced sales of assets in adverse market conditions (such as low demand in the presence of oversupply).

Purchase and redemptions

If the purchase and redemption orders for Fund units are received late or do not meet the requirements in the Prospectus and the Fund Rules, there will be a delay between the time of placing the order and the actual date on which the purchase or redemption is executed. Such delays may lead to a decrease in the number of units purchased or amounts received from redemptions.

Trading on a stock exchange

There can be no guarantees that the Fund will be approved for trading on a regulated market and/or that units of the Fund will continue to be traded or that the criterion for admission to trading will not change. Moreover, trading of the units on a stock exchange may be suspended under the rules of the respective exchange due to market conditions, and investors may not be able to sell their units until trading resumes.

Regulatory risk

The Prospectus has been prepared in compliance with the applicable laws and regulations. The Management Company and/or the Fund and its investment objectives and policies may be affected by future changes in laws and regulations. New or modified laws, rules and regulations in Bulgaria or the European Union could prevent or significantly limit the Fund’s ability to invest in certain instruments. They could also prevent the signing of agreements with certain third parties. This may affect the ability of the Fund to fulfil the respective investment objectives and policies. Applying such new or modified laws, rules and regulations could lead to an increase of all or some of the Fund’s costs and may require the restructuring of the Fund, in order to meet the new rules. Such a restructuring may include restructuring costs. When restructuring is not possible, the Fund may proceed to termination. The assets of the Fund and the Reference Index are subject to change in laws or regulations and/or such changes might affect their value and/or liquidity.

Operational risk

It is associated with the potential of loss resulting from errors or system failures in the organisation, insufficiently qualified personnel, unfavourable external events that are not financial in nature, incl. legal risk.

Tracking error risk

Tracking the Reference Index by investing in all positions in the index can be costly and difficult to implement. The portfolio manager may use optimization techniques such as selection of individual positions in the Index in proportions that differ from those in the Index. The use of such optimization techniques can increase the tracking error and lead to a different performance of the Fund compared to that of the Index. Furthermore, existing restrictions or future changes in laws and regulations of the Fund about, but not limited to, the composition, concentration and method of assets valuation can lead to the inability of the Fund to replicate the Index in full. Also, exchange-traded funds in markets characterized by low liquidity may be exposed to a higher tracking error.

Reference Index

If there is an event that affects the Index, the Fund may be required to suspend the issuance and redemption of units. The valuation of the Fund may also be affected. In case of continuing problems with the Index, the Fund will take appropriate actions, which may reduce the net asset value of the Fund.

Systemic risks

Systemic risks depend on general fluctuations in the economy and the markets in general. The Fund cannot influence the systemic risks but registers them and takes them into account. Risks arising from the political and economic situation are possible instability or military actions in the region. Disasters and accidents are factors complicating any system of risk management. The consequences are hard to predict, but access to information and the implementation of a system for forecasting and actions in extreme situations are possible ways to mitigate the negative effects.

Structure and activity indicators in percentage

A. Operating Expenses					
Expense Type	2017	%	2016	%	

2. Expense from transactions with securities:	1 166 020	74.75	831 388	88.51
3. Expense from currency rate transactions		0.00	21	0.00
4. Other	319 090	20.45	65 341	6.96
2. Expenses from outsourcing	74 856	4.80	42 596	4.53
Total Expenses	1 559 966	100.00	939 346	100.00
Financial Result	2 349 497		1 782 571	

A. Operating income				
	2017	%	2016	%
1. Dividend income	809 077	20.30		0.00
2. Income from transactions with securities, incl.:	3 166 863	79.48	1 380 940	99.91
Subsequent measurement	74 956	0.00	1 317 783	48.41
3. Income from currency rate transactions		0.00	299	0.02
4. Interest income	8 419	0.02	895	0.06
Total Revenues	3 909 463		1 382 134	

Assets	Current period	%	Previous period	%
B. Current Assets				
2. Cash and cash equivalents	1 589 181	5	4 686 000	18,34
1. Financial instrumetns, incl.:				0
Shares	29 527 297	95	20 797 464	45
Rights	843.00	0.00	20 797 464	45
2. Receivables related to transactions with inancial instruments	417	0.00		0.00
Total	31 191 851	100.00	25 483 464	81,61
Off-balance sheet assets			26 565	

Equity & Liabilities	Current period	%	Previous period	%
Units	25 400 000	0.82	22 630 000	0.89
II. Reserves				
1. Subscription premium/redemption discount	2 872 940	0.09	2 386 192	0.09
Retained earnings	464 788	0.01		0.00
2. Current year profit/(loss)	2 349 497	0.08	464 788	0.02
Total Equity	31 087 225	1.00	25 480 980	1.00
B Current Liabilities				
2. Liabilities to financial institutions, incl.:	27 351		789	0.24
To the Custodian	1 053	3,55	789	0.24
To the Management Company	26 298	88,63		0.00
10. Other	2 320	7,82	1 697	0.52
Total Current Liabilities	29 672	100.00	3 275	1.00
Off-balance sheet liabilities	0		26 565	

Tracking Error Report in Compliance with Article 82e of Ordinance 44, 20th October 2011, on the Requirements on the Activity of Collective Investment Schemes, Their Management Companies, National Investment Funds and Managers of Alternative Investment Funds.

ISIN	ETF's name	Expected Tracing Error	Implemented Tracking Error (on a weekly basis)	
BG9000011163	Expat Bulgaria SOFIX UCITS ETF	Up to 10%	2.73%	
ISIN	ETF's name	ETF Return 2017*	Index Return**	Tracking Difference
BG9000011163	Expat Bulgaria SOFIX UCITS ETF	8.96%	15.52%	-6.56%

The tracking difference is partly due to a limitation, in effect until 2017, referring to the total value of the transferable securities held by the Fund in each of which it invests more than 5 % of its assets which should not exceed 40 % of the value of its assets.

The realised tracking error for the period was calculated on a weekly basis monitoring.

Our 2018 tracking error expectations are for not more than 10% figure, deriving from the limited ETF trading history on the Bulgarian market, and the one of Expat Bulgaria SOFIX UCITS ETF.

The tracking error represents the volatility (measured through the annual standard deviation) difference of the return of the Fund and the one of the SOFIX index for a defined period. A lower tracking error would mean a closer index tracking. However, that is different than the tracking difference, which stands for the difference between the return of the Fund and the Return of the Index for a defined period. The tracking difference measures to what percentage extend did the Fund perform better or worse than the SOFIX index, while the tracking error represents the constant in the difference between the performance of the Fund and the SOFIX Index's one.

Expat Asset Management EAD Management Company's major shareholder is Expat Capital AD.

The Representatives and the Members of the Board of Directors of Expat Asset Management EAD Management Company are

1. Nicola Simeonov Yankov
2. Nikolay Vassilev Vassilev
3. Lachezar Dimitrov Dimov
4. Maria Dimitrova Boychinova
5. Nikola Emilov Veselinov

Investor Relations Manager:

Natalia Todorova, Sofia, Bulgaria, 96A G.S. Rakovski Str., tel. (+359 2) 980 1881, fax: (+359 2) 980 7472, email: office@expat.bg, website: www.expats.bg

The remuneration to the Board of Directors amounted to BGN 725 000 in 2017.

There are no contracts under Article 240b of the Law of Accounting concluded with the members of the Board of Directors or related parties to the Board of Directors.

No restrictions apply to board members to acquire Fund's shares.

Information about acquired Fund's shares by members of the management or the controlling bodies, lawyers or the top-level management

Next year investment policy

No changes to the Fund's policy is planned. The Fund will track the SOFIX index with full replication.

No important events have occurred after the date of this document.

The following information is required under Article 39 of the Law of Accounting is not applicable for an ETF.

- Information under Article 247 of Companies Act
- Research and development activity
- Information for own shares acquisition
- Planned economic policy for the upcoming year
- Expected investments and personnel development
- The expected return from investments and company development
- Upcoming deals of sustainable importance for the company's activity
- Company's branches

Information on the portfolio structure of the Fund is published under Article 73 of the ACISOCIVA.

The Fund made no payments to the government in excess of BGN 195 600 in one instalment or a succession of instalments.

Information about transactions in the period between the issuer or the person under Par 1d of the additional provisions of POSA and related parties

Over 2017 the Fund has calculated the following management fees:

Management fee	BGN 299 645
Subscription and redemption fees	BGN 134 263

Information about off-balance sheet transactions – nature and goal: No such transactions occurred. In the previous accounting period BGN 27 000 transfer occurred with a book entry date 02.01.2017.

Analysis and assessment of the policy with regard to financial funds management indicating opportunities for meeting liabilities

The Fund follows the requirements under the POSA regarding assets and analyses daily liquidity needs.

REMUNERATION POLICY INFORMATION
In compliance with Article 73 of Regulation 44

Expat Bulgaria SOFIX UCITS ETF did not appoint any employees during the 2017 financial year and does not have an adopted Remuneration Policy.

The present acting Remuneration Policy of Expat Asset Management EAD Management Company is adopted with decision № 178 from 19.12.2016 by the Board of Directors. The current policy for definition and distribution of remunerations at Expat Asset Management EAD is adopted in compliance with the requirements of Law for Amendments and Additions to the Law on the Activities of Collective Investment Schemes and Other Collective Investment Undertakings 2016 for the remuneration requirements section and, in concrete, under the provisions under articles 108 and 108a, and taking into account the provision of EU Directive 2014/91 for amendment of Directive 2009/65/EO.

Scope

Article 2. The current Remuneration Policy applies to the remunerations of the following employees categories:

- i.** The Board of Directors members and the employees of senior management stance;
- ii.** Risk embodied during the working process employees;
- iii.** Employees executing controlling activities;
- iv.** Any other employees whose remuneration is fairly comparable with the ones of the aforementioned employees under **i.** and **ii.**, and who under their job description definition affect the risk profile of Expat Asset Management EAD as well as its subsidiary collective investment schemes;

Under the scope of article 108, par. 1, point 4 of the Law on the Activities of Collective Investment Schemes and Other Collective Investment Undertakings are quoted individuals of the following professional authorities: portfolio managers and risk managers who have direct impact on the risk profile of the Collective Investment Scheme.

As decided by its Management Team, the Management Company does not have a Remuneration Committee.

Section Two
Remunerations
Remuneration Types

Article 3. The employees' remunerations under **Article 2.** may be constant or variable. The variable ones apply for the traditional Easter and Christmas bonuses, the 13th and 14th monthly salary, and other additional remunerations that are not directly linked to the performance of the Management Company's activity or its subsidiary collective investment schemes; and are defined and determined in accordance with the criterion under the employment contracts practices and the Labour Code.

Remuneration Allocation

Article 4. The constant and variable remunerations for employees of different professional seniority are determined as following:

- i.** For Board of Directors members: a sole capital owner decision applies
- ii.** For all the remaining employees under **Article 2.:** an Executive Director's decision applies

Leading principles whenever determining constant remuneration

Article 5. Whenever determining a constant remuneration the labour market competition principle applies, thus the needs of attracting highly qualified and adequately paid employees are met.

Leading principles whenever determining variable remuneration

Article 6. The variable remuneration is not paid in installments, also variable remuneration retention does not apply, and that is not embodied under the employment agreement contracts of the Company's employees.

Maximum variable remuneration amount and constant to variable remuneration correlation

Article 7. (1) The Management Company distributes a total common sum of the variable remuneration for all employees for the corresponding year in such amount that is of no dependence on the net profit of the Company or by other results being achieved.

(2) The exact amount of the variable remuneration per employee under the common total amount frame under **par. (1)** is determined individually per employee as it may NOT exceed:

- i.** For Board of Directors members and employees of senior management stance: 200% of their constant gross annual salary.
- ii.** For risk embodied during the working process employees: 200% of their constant gross annual salary.
- iii.** For employees executing controlling activities: 200% of their constant gross annual salary.
- iv.** For all other employees whose remuneration is fairly comparable with the ones of the aforementioned employees under **i.** and **ii.**, and who under their job description definition affect the risk profile of Expat Asset Management EAD as well as its subsidiary collective investment schemes: 200% of their constant gross annual salary.

Distribution and rescheduling of the variable remuneration

Article 8. (1) The distribution of the variable remuneration is not rescheduled in installments unless that is quoted under an enactment.

(2) In case of an embodied variable remuneration rescheduling under an enactment, the rescheduling itself is for the minimal amount required and for the minimal period under the enactment.

(3) The distribution pattern of the variable remuneration's rescheduled part during the rescheduling period is determined by the Board of Directors in compliance with the corresponding regulations.

Compensations Limitations

Article 9. The compensations in relation to early employment contract termination of some of the abovementioned individuals under **Article 2.** represent the individual's achieved results during their work timeline, and are determined in such manner that failure is not rewarded.

Article 15. In case of subsequent enactments changes and a following contradiction between them and the Remuneration Policy, the provisions of the Remuneration Policy are automatically cancelled and replaced with the corresponding legal norms.

For the 2017 financial year **Expat Bulgaria SOFIX UCITS ETF** did not pay any constant or variable remunerations due to the lack of employees appointed by the fund.

REFERENCE WITH ADDITIONAL INFORMATION

on “Expat Bulgaria SOFIX UCITS ETF”

According to the Requirements of Art. 73, para. 1, Section 5 of Regulation 44 as of year 2017

1. General information on the Fund

“Expat Bulgaria SOFIX UCITS ETF” is organized and managed by Expat Asset Management EAD Management Company as a collective open-ended investment scheme for investing in securities and other liquid financial assets established and operating in accordance with the Collective investment schemes and other undertakings for collective investment Act (ACISOCIVA), the Law on obligations and contracts and the other applicable laws of Republic of Bulgaria.

The investment object of the Fund is to track the performance of the SOFIX index (“Reference index“, “the Index“), by adhering to the method of full physical replication while mitigating the Index tracking error level (“tracking error”).

The reference index is SOFIX, denominated in Bulgarian Lev (BGN) currency. The Reference index is weighted by market capitalization and is adjusted for the level of free float shares. Reference index tracks the performance of 15 of the largest and most liquid shares on the "BSE-Sofia" AD. The reference index is one of the major benchmark indices for "BSE-Sofia" AD and its performance is strongly tied to the performance of the overall market. A full description of the Reference Index, its composition, methodology for selecting the composition and weight of the selected companies in the Index is available on the web site of "BSE-Sofia" AD <http://www.bse-sofia.bg/?page=Indices>.

Address of management and office: City of Sofia, 96A, Georgi S. Rakovski Str.; phone: +359 2 980 1881; fax: +359 2 980 7472; website www.expat.bg.

“Expat Bulgaria SOFIX UCITS ETF“ calculates net assets value and redemption price of shares each business day and publishes them on www.baud.bg, www.investor.bg, on the website of Expat Asset Management Company and FSC in accordance with the terms specified in the Prospectus.

2. Carrying out operations and financial position of the Fund for 2017

As a fund for full physical replication of an index, “Expat Bulgaria SOFIX UCITS ETF” invests in a manner and in accordance with the Rules of the Exchange Traded Fund. Up to 100% of the fund's assets are in stock and rights of companies, admitted to or traded on a regulated market under Art. 73 of MFIA or traded on another regulated market in Bulgaria that constitutes the Reference index.

For the period 01.01.2017 – 31.12.2017	Date	Value (BGN)
Minimum calculated NAV/share	03.01.2017	1.1266

Maximum calculated NAV/share	16.08.2017	1.3285
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Number of outstanding shares and net asset value per share of “Expat Bulgaria SOFIX UCITS ETF“ for the period 1 January – 31 December 2017

As at 1 January 2017 the number of the outstanding shares is **22 630 000**, as at December 31, 2017 - **25 400 000** shares.

During the period **2 720 000** shares have been claimed to the traded fund for redemption and **5 490 000** shares have been issued.

The net asset value per share as at 1 January 2017 was **BGN 1.1260**.

The net asset value per share as at 31 December 2017 was **BGN 1.2269**.

Volume of investments in “Expat Bulgaria SOFIX UCITS ETF” portfolio

Type of securities	Value as at 31.12.2017 (BGN)	% of the assets value	Value as at 31.12.2016 (BGN)	% of the assets value
Stock	29 602 253	94.90%	20 797 464	81.53%
Blocked securities				
Stock rights				
Shares in Collective Investment Schemes				
Cash in hand				
Cash in current accounts	1 589 181	5.09%	4 712 566	18.47%
Deposits				
Debt securities				
Receivables from interest				
Sale of securities in settlement	417	0.00%		
Receivables from dividends				
Receivables under forward contracts				
Deferred expenses				

Total value of portfolio	31 191 851	100.00%	25 510 030	100%
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The structure of assets and the share in financial instruments are in accordance with the regulations and the Rules of the fund. Cash in hand, in current accounts and bank deposits with maturity of up to three months form the liquidity of the Fund and as at 31.12.2017 represent 5.09% of the total amount of assets.

Changes in the portfolio structure of “Expat Bulgaria SOFIX UCITS ETF”

Issuer	ISIN	Value as at 31.12.2017 (BGN)	% of the assets value	Value as at 31.12.2016 (BGN)	% of the assets value
1. Stock					
Advance Terrafund REIT	BG1100025052	3 119 180	10.00%	2 372 144	9.30%
Albena AD	BG11ALBAAT17	2 234 410	7.16%	1 373 285	5.38%
Doverie United Holding AD	BG1100038980	620 661	1.99%		
Eurohold Bulgaria AD	BG1100114062	1 441 370	4.62%		
Industrial Capital Holding	BG1100010989			633 599	2.48%
Industrial Holding Bulgaria AD	BG1100019980	790 511	2.53%	1 284 411	5.03%
M+C Hydraulic AD	BG11MPKAAT18	1 909 849	6.12%	1 405 947	5.51%
Monbat AD	BG1100075065	2 020 501	6.48%	1 825 595	7.16%
Neochim AD	BG11NEDIAT11	774 620	2.48%	1 050 390	4.12%
First Investment Bank AD	BG1100106050	2 662 958	8.54%	1 396 086	5.47%
Sirma Group Holding AD	BG1100032140	958 971	3.07%		
Sopharma AD	BG11SOSOBT18	4 502 480	14.43%	2 559 811	10.03%
Stara Planina Holding AD	BG1100005971	2 750 842	8.82%	1 339 536	5.25%
Trace group Hold АД	BG1100049078			165 800	0.65%
Bulgarian Real Estate Fund REIT	BG1100001053	1 118 534	3.59%	1 317 900	5.17%
Chimimport AD	BG1100046066	3 334 537	10.69%	3 000 962	11.76%
Varna Holding AD	BG1100036984			82 564	0.32%
Central Cooperative Bank AD	BG1100014973	1 362 829	4.37%	989 436	3.88%
2. Government Bonds					
3. Bonds					
4. Shares in Collective Investment Schemes					
5. Rights					
6. Cash in hand and current accounts		1 589 181	5.09%	4 712 566	18.47%
7. Deposits					
8. Sale of securities in settlement					

9.Receivables, incl. from interest, dividends					
Total value of portfolio		31 191 851	100%	25 510 030	100.00%

* Item 9 includes receivables from interest on deposits, deferred expenses.

Changes in assets type – liabilities, income and expenses of “Expat Bulgaria SOFIX UCITS ETF” for the last three years

Current liabilities	As of 31.12.2017 (BGN)	As of 31.12.2016 (BGN)
1. Liabilities to Management Company under Management contract	26 298	26 565
2. Liabilities to Custodian	1 053	789
3. Liabilities to subscription and redemption	0	0
4. Liabilities to Investment Broker	2 320	1 697
5. Liabilities under transactions with securities		0
6. Liabilities under forward contracts		0
7. Other		0
Total:	29 671	29 051

Receivables	As of 31.12.2017 (BGN)	As of 31.12.2016 (BGN)
1. Receivables from transactions with securities	417	0
2. Receivables relating to issue	0	0
3. Receivables from interest accrued on deposits	0	0
4. Receivables from interest accrued and dividends	0	0
5. Receivables from interest accrued in foreign currency	0	0
6. Other	0	0
Total:	0	0

Income	As of 31.12.2017 (BGN)	As at 31.12.2016 (BGN)
1. Income from interest	8 418	895
2. Income from transactions with securities	0	1 402 940
3. Income from exchange rate differences due to depreciation	3 202 447	0
4. Income from exchange rate differences in foreign currency transactions	0	299
5. Income from interest in other transactions	0	0
6. Income from share participation	809 077	0
7. Other income	0	0
Total:	4 019 942	1 404 134

Expenses	As of 31.12.2017 (BGN)	As of 31.12.2016 (BGN)
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1. Expenses for transactions with investments	1 166 020	831 388
2. Expenses for depreciation		0
3. Expenses for exchange rate differences		21
4. Expenses for outsourcing	74 856	42 596
5. Commissions, taxes and other	354 613	59 653
6. Other		5 688
Total:	1 595 489	939 346

	As of 31.12.2017 (BGN)	As of 31.12.2016 r. (BGN)
1. Liabilities to Management Company	299 646	48 273
2. Remuneration to Custodian	16 698	2 560
3. Liabilities to Investment Broker	38 080	8 807
4. Bank fees	189	14

Comparison table for the last three fiscal years

	31.12.2017	31.12.2016
Net asset value	31 162 180.37	25 481 677.30
Number of shares	25 400 000.0000	22 630 000.0000
Net asset value per share	1.2269	1.1260

Pursuant to Art. 174 of the Law on Corporate Income Tax, collective investment schemes that are admitted for public offering in Republic of Bulgaria are not subject to corporate tax.

“Expat Bulgaria SOFIX UCITS ETF” is not subject to Corporate tax as within the meaning of Art. 4, para 1 of ACISOCIVA it is a collective investment scheme.

Transactions with derivative instruments

During the reporting period “Expat Bulgaria SOFIX UCITS ETF” did not perform transactions with derivative financial instruments.

Tracking Error

Tracking error is the volatility (measured by annualized standard deviation) of the difference between the returns of the Exchange Traded Fund and those of the Reference index over a given period of time. A lower tracking error means closer tracking of the Index. This is not the same as difference in tracking, which is simply the difference between the returns of the Fund and those of the Reference index over a given period of time. The difference in tracking shows the percentage by which the Fund has performed better or worse than the Index while the tracking error indicates consistency in the difference in performance of the Fund and the Reference Index.

ISIN	Name of Exchange Traded Fund	Tracking error estimate for the period	Realized tracking error (weekly observations)
BG9000011163	Expat Bulgaria SOFIX UCITS ETF	Up to 10%	2.73%

ISIN	Name of Exchange Traded Fund	Returns of ETF 2017	Returns of Index 2017	Difference in tracking
BG9000011163	Expat Bulgaria SOFIX UCITS ETF	8.96%	15.52%	-6.56%

The tracking difference is partly due to a limitation, in effect until 2017, referring to the total value of the transferable securities held by the Fund in each of which it invests more than 5 % of its assets which should not exceed 40 % of the value of its assets.

The realized tracking error for the period has been calculated on the basis of weekly data.

**To the Shareholders of
“Expat Bulgaria SOFIX UCITS ETF”**

**INDEPENDENT AUDITOR’S REPORT
Referring to the audit of financial statements**

Opinion

We have audited the individual financial statements of **“Expat Bulgaria SOFIX UCITS ETF” (the Fund)**, which comprise the Balance sheet as of 31 December 2017, Statement of Profit and Loss and other comprehensive income, Statement on changes in equity and Cash flow statement for the year then ended, explanatory notes to the financial statements and a summary disclosure of significant accounting policies.

In our opinion, the financial statements present fairly, in all material respects, the financial position of “Expat Bulgaria SOFIX UCITS ETF” as of 31 December 2017 and its financial results and cash flow for the year then ended in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union (EU).

Basis for expressing opinion

We conducted our audit in accordance with the requirements of International Standards on Auditing (ISA). Our responsibilities under these standards are further described in the "Auditor's responsibilities for the audit of the financial statements" section of our report. We are independent of the Fund in accordance with the international Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), along with the ethical requirements of the Independent Financial Audit Act (IFAA), applicable to our audit of the financial statements in Bulgaria, and we have fulfilled our other ethical responsibilities in accordance with the IFAA and the IESBA Code. We believe that the audit evidences we have obtained are sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in the audit of the financial statements of the current period. These matters are addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

See Annex “Current financial instruments to the financial statements”.

Key audit matter	<i>How this key audit matter was addressed in the audit conducted by us</i>
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<p><i>In the course of our work we determined the financial assets of the Fund disclosed in the financial statements amounting to BGN 31 192 thousand as an essential object of the audit.</i></p>	<p><i>In this area, our audit procedures included testing of internal control over measurement of financial assets. We have compared the confirmation by the Custodian of the Fund for adequacy of the analytical information about the financial assets of the Fund.</i></p>
<p><i>Material to the financial statements are transactions on issue of shares of the Fund and correct reporting of information provided to the shareholders.</i></p>	<p><i>In this area, our procedure included confirmation of data from the accounting registers of the Fund with the information from the Central Depository.</i></p>
<p><i>Material to the financial statements are correct reporting of information about the net asset value per share</i></p>	<p><i>In this area, our procedure included confirmation of data from the accounting registers of the Fund with the information from the Custodian.</i></p>

Information other than financial statements and the auditor's report thereon

Management is responsible for the other information. The other information comprises report on the activity, including corporate governance statement (optional for the Fund pursuant to BSE Rules), non-financial statement (optional for the Fund pursuant to Art. 41 of the Accounting Act) and report on payments to governments (optional for the Fund pursuant to article 53 par. 3 of the Accounting Act) prepared by management in accordance with Chapter VII of the Accounting Act, but does not include the financial statements and our audit report thereon, which we received prior to the date of our audit report.

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

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, to 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 management and those charged with governance for the financial statements

The Management is responsible for preparing and presenting these financial statements in compliance with the International Financial Reporting Standards applicable in the EU and for implementing such a system of internal control as Management thinks fit so as to ensure that the financial statements are free from material misstatements, whether caused by fraud or error.

As part of the preparation of the financial statements, management is responsible for assessing the Fund's ability to continue as a going concern and disclosing, as applicable, matters related to going concern assumption and using the going concern base of accounting unless management either intends to liquidate the Fund or to cease operations, or has no realistic alternative but to do so.

Those in charge of governance are responsible for supervising the process of the financial reporting of the Fund.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Independent Financial Audit Act and ISAs 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 the audit in accordance with ISA, we use 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 to the auditor, and neglecting or overriding the 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 management.
- Conclude on the appropriateness of management'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 raise 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 auditor's 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 auditor's report. However, future events or conditions may cause the Group 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 so that the financial statements give a true and fair view.

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.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicated with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the issues communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements for the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

Additional matters to be reported pursuant to the Accounting Act and the Public Offering of Securities Act

In addition to our responsibilities and reporting under ISA described above in "Information other than the financial statements and the auditor's report thereon" section in terms of management report, the corporate governance statement, non-financial statement and report on payments to governments, we have fulfilled also the procedures added to the required procedures under ISA as instructed by the professional organization of Certified Public accountants and registered auditors in Bulgaria - Institute of Certified Public Accountants (ICPA). These procedures refer to verification of the presence and verification of the form and content of such other information to help us in forming opinions about whether the other information includes disclosures and reports provided for in Chapter Seven of the Accounting Act and the Public Offering of Securities Act (Art. 100n, para. 10 of POSA in connection with art. 100n, para. 8, item 3 and 4 of POSA) applicable in Bulgaria.

Opinion in connection with Art. 37 para 6 of the Accounting Act

Based on procedures performed, our opinion is that:

- a)** The information included in the activity report for the fiscal year for which the financial statements are prepared is consistent with the financial statements.
- b)** The activity report was prepared in accordance with the requirements of Chapter Seven of the Accounting Act and Art. 100 (n), para. 7 of the Public Offering of Securities Act.
- c)** In accordance with the BSE Sofia Rules issuers willing to be admitted to trading on the BSE Main market, Premium Equities Segment are obliged to operate in accordance with the National Corporate Governance Code, approved by the Exchange. The good corporate governance rules are disclosed in the Fund's Prospectus.
- d)** Non-financial statement for the fiscal year for which financial statements are prepared does not apply to the Fund.
- e)** The report on payments to governments for the fiscal year for which financial statements are prepared does not apply to the Fund in accordance with the requirements of Chapter Seven of the Accounting Act.

Opinion in connection with Art. 100 (n), para 10 in conjunction with Art. 100 n, para. 8, item 3 and 4 of the Public Offering of Securities Act

Based on the procedures performed and the obtained knowledge and understanding of the enterprise and the environment in which it operates, in our opinion, the description of the main features of the internal control and risk management systems of the enterprise in connection with the financial reporting process, which is part of the activity report (as part of the contents of the corporate governance statement) and the information under Art. 10, para 1, letters "c", "d", "e", "h" and "i" of Directive 2004/25 / EC of the European Parliament and the Council dated 21 April 2004 on takeover bids (not applicable) do not contain any material misstatements.

Additional reporting referring to the audit of the financial statements in connection with Art. 100 (n), para. 4, item 3 of the Public Offering of Securities Act'

Statement in connection with Art. 100 (n), para. 4, item 3, letter "b" of the Public Offering of Securities Act

The information about related party transactions is disclosed in Paragraph Management Company and related parties of disclosure information to the financial statements. Based on the audit procedures performed by us on related party transactions as part of our audit of the financial statements as a whole, no facts, circumstances or other information have come to our attention based on which to conclude that the related party transactions have not been disclosed in the accompanying financial statements for the year ended 31 December 2017 in all material respects, in accordance with the requirements of IAS 24 Related Party Disclosures. The results of our audit procedures on related party transactions were addressed by us in the context of forming our opinion on the financial statements as a whole and not for the purpose of expressing a separate opinion on related party transactions.

Statement in connection with Art. 100(n), paragraph 4, item 3 letter "c" of the Public Offering of Securities Act

Our responsibilities for the audit of the financial statements as a whole, described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report include an evaluation as to whether the financial statements present the significant transactions and events in a manner that achieves fair presentation. Based on the audit procedures performed by us on the significant transactions underlying the financial statements for the year ended 31 December 2017, no facts, circumstances or other information have come to our attention based on which to conclude that there are material misrepresentations and disclosures in accordance with the relevant requirements of IFRSs as adopted by the European Union. The results of our audit procedures on Fund's transactions and events significant for the financial statements were addressed by us in the context of forming our opinion on the financial statements as a whole and not for the purpose of expressing a separate opinion on those significant transactions.

Reporting in accordance with Art. 10 of Regulation (EU) No 537/2014 in conjunction with the requirements of Art. 59 of the Law for the Independent Financial Audit

In accordance with the Law for the Independent Financial Audit requirements, in conjunction with Art. 10 of Regulation (EU) No 537/2014, we report additionally and the following information.

- CPA Emilia Gyurova was appointed as statutory auditor of the financial statements for the year ended December 31, 2017 of “**Expat Bulgaria SOFIX UCITS ETF**” **Exchange Traded Fund** ("the Fund") by the Management Company Expat Asset Management AD for a period of one year on June 6, 2017.
- The audit of the financial statements for the year ended December 31, 2017 of the Fund represents the first in sequence comprehensive continuous commitment to statutory audit of that undertaking conducted by us.
- We confirm that we have expressed an opinion in accordance with the additional report submitted to the Audit Committee of the Fund, in accordance with Art. 60 of the Law for the Independent Financial Audit.
- We confirm that we did not provide the referred to in Art. 64 of the Law for the Independent Financial Audit prohibited services outside the audit.
- We confirm that in conducting the audit we have maintained our independence from the Fund.
- For the period that our statutory audit refers to, except for the audit, we have not provided other services to the Fund [and to controlled by Fund undertakings] which were not mentioned in the activity report or the financial statements of the Fund:

Emilia Gyurova,
26.03.2018

REGISTERED AUDITOR 0590, CPA
Signature: */illegible/*

Sofia

INDIVIDUAL STATEMENT OF FINANCIAL POSITION

Name of the Collective Investment Scheme:
 Expat Bulgaria SOFIX UCITS ETF
 Fiscal year: 01.01.2017 - 31.12.2017

BULSTAT Unified Identification Code: 177067176

	31.12.2017 BGN'000	31.12.2016 BGN'000
Non-current assets		
Non-current financial assets	0	0
Fixed assets		
Total Non-current assets	0	0
Current assets		
Non-current financial assets	29 603	20 797
Receivables and prepaid expense	0	0
Cash and cash equivalents	1 589	4 686
Total Current assets	31 192	25 483
Off-balance sheet assets		27
Total assets	31 192	25 510
Equity		
Share capital	25 400	22 630
Reserves	2 873	2 386
Retained earnings	2 889	465
Total capital	31 162	25 481
Current liabilities		
Payables to third party	30	2
Total current liabilities	30	2
Total equity and liabilities	31 192	25 483
Off-balance liabilities		27
Total liabilities	31 192	25 510
Units in issue as of 31.12.2017	25 400 000	22 630 000
NAV per share as of 31.12.2017	1.2269	1.1260

INDIVIDUAL STATEMENT OF COMPREHENSIVE INCOME

**Name of the Collective Investment Scheme: Expat Bulgaria
SOFIX UCITS ETF**

BULSTAT Unified Identification
Code: 177067176

Fiscal year: 01.01.2017 - 31.12.2017

	Year ended December 31, 2017	Year ended December 31, 2016
	BGN'000	BGN'000
Continuing operations		
Financial income	3 984	1 382
Other revenues from continuing operations		
Total revenues from continuing operations	3 909	1 382
External services	75	43
Financial expenses	1 485	874
Total expenses by economic elements	1 560	917
Profit/(Loss) before taxes	2 424	465
Deferred tax income/expense		
Other comprehensive income and expense	0	0
Share issuance premium	1 044	2 415
Redemption reserve	(557)	(29)
Total comprehensive income	2 911	2 851

INDIVIDUAL STATEMENT OF CASH FLOWS

Name of the Collective Investment Scheme: Expat Bulgaria SOFIX UCITS ETF

BULSTAT Unified
Identification Code:
177067176

Fiscal year: 01.01.2017 - 31.12.2017

	Period from 01.01.2017 to 31.12.2017	Period from 19.08.2016 to 31.12.2016
	BGN'000	BGN'000
Cash and cash equivalents at the beginning of the year	4 686	0
<hr/>		
Cash flows from operating activities		
Proceeds from share issue/payment for share redemption	(2 787)	(33)
Payment to creditors	(75)	
Cash flows from investing activities	(235)	4 719
Paid direct and indirect taxes	0	0
Net cash flows from operating activities	(3 097)	4 686
<hr/>		
Net increase/(net decrease) in cash and cash equivalents	(3 097)	4 686
<hr/>		
Cash and cash equivalents at the end of the year	1 589	4 686
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INDIVIDUAL STATEMENT OF CHANGES IN EQUITY

Name of the Collective Investment Scheme: Expat Bulgaria
SOFIX UCITS ETF

Fiscal year: 01.01.2017 - 31.12.2017

BULSTAT Unified Identification
Code: 177067176

	Share capital	Premium reserve	Total reserve	Profit/(Loss)	Total capital
	BGN'000	BGN'000	BGN'000	BGN'000	BGN'000
Balance as of 01.01.2016					
Total comprehensive income for the period					
Profit for the year				465	465
Issuance/Redemption	22 630				22 630
Increase/Decrease		2 386			2 386
Balance as of 31.12.2016	22 630	2 386	0	465	25 481
Issuance/redemption	2 770				2 770
Profit for the year				2 424	2 424
Increase/Decrease		487	0	0	487
Balance as of 31.12.2017	25 400	2 873	0	2 889	31 162
15.01.2018					
Gergana Andonova	Lachezar Dimov		Lachezar Dimov		
Head of Accounting	Member of the Board of Directors		Member of the Board of Directors		

Audited by Emilia Gyurova, 26.03.2018

NOTES TO THE FINANCIAL STATEMENTS AS OF 31.12.2017

“**Expat Bulgaria SOFIX UCITS ETF**”, city of Sofia (“Expat Bulgaria SOFIX UCITS ETF”, or “the Fund”) is a collective open-ended investment scheme for investing in securities and other liquid financial assets, established and operating in accordance with the Collective investment schemes and other undertakings for collective investment Act (ACISOCIVA), the Public Offering of Securities Act (POSA) and the regulations for its implementation, the Markets in financial instruments Act (MFIA), the Law on obligations and contracts (LOC) and the other applicable laws of the Republic of Bulgaria. The Fund’s property is divided into shares that are constantly changing depending on the volume of sales and redemption of shares. The Mutual Fund is not a legal entity and is organized and managed by a Management Company that makes all decisions regarding the existence, operation and termination of the Fund.

The Fund is organized by resolution No. 158/ 01.07.2016 of the Board of Directors of MC "Expat Asset Management" EAD and is considered to have been incorporated with its entry in the register of the Financial Supervision Commission ("the Commission") on 23.08.2016 under authorization No. 156. The Fund operates under the permanent supervision of the Commission. The Fund is having the following address: city of Sofia, 96A, G. S. Rakovski Str., phone: (+359 2) 980 1881, fax: (+359 2) 980 7472, e-mail: office@expat.bg, website: www.expat.bg. The Fund is not limited by a validity period.

The Management Company of the Fund is Expat Asset Management EAD, with registered office and address: city of Sofia, 96A, GS Rakovski Str., phone: (+359 2) 980 1881, fax: (+359 2) 980 7472, e-mail: office@expat.bg, website: www.expat.bg. The MC has received authorisation to launch and manage Expat Bulgaria SOFIX UCITS ETF with an entry in the register of the Financial Supervision Commission ("the Commission") - No. 156-DF/23.08.2016. The Management Company is not limited by a validity period.

Custodian of the Fund is “*Eurobank Bulgaria*” AD, with registered office and address: city of Sofia, 260, Okolovrasten pat Str., phone: (+ 359 2) 816 6215; fax: (+ 359 2) 988 8191; e-mail: custody@postbank.bg, website: www.postbank.bg. The Custodian shall keep the assets of “Expat Bulgaria SOFIX UCITS ETF”, exercise control on its operations and calculate the Fund’s net asset value.

The enclosed Financial statements were approved by the Board of Directors of the MC “Expat Asset Management” EAD for presentation on 29.01.2018

INVESTMENT INFORMATION

Investment Objectives

The investment objective of the Fund is to track the performance of the SOFIX index (“Reference index”, “the Index”), by adhering to the method of full physical replication while mitigating the tracking error level. Reference index tracks the performance of 15 of the largest and most liquid shares on the "BSE-Sofia" AD.

There can be no assurance that “Expat Bulgaria SOFIX UCITS ETF” will accomplish its investment objectives.

Investment Strategy and Policy

In order to reach the highest possible correlation with the performance of the Reference Index, the Fund will follow the model of full physical replication, which means that it will invest mainly in a basket of balance sheet assets comprised of shares of companies in the Reference Index.

Composition and structure of the Fund portfolio, asset classes in which the Fund will invest, investment restrictions

As a fund for full physical replication of an index, Expat Bulgaria SOFIX UCITS ETF will invest in a manner and in accordance with its Rules. Its assets may be invested in the following groups of financial instruments:

1. Up to 100% of the fund's assets in equities and company rights of the constituting the Reference Index. In order to comply with the legal restrictions and maintain liquidity to meet the redemption needs, the Fund will maintain a minimum level of cash and cash equivalents, which will limit the weight of the equities for replication of the Reference Index.
2. Bank deposits payable on demand or eligible to be withdrawn at any time and maturing in no more than 60 days, provided that the bank is headquartered in the Republic of Bulgaria or in another Member State of the EU, and if established in a third country, provided that it is subject to regulations that the Deputy-Chairman of the FSC considers equivalent to those under the EU law – up to 20% of the Fund's assets.
3. Without limitation, in total of up to 100% of the Fund's assets can be invested in securities and money market instruments issued by the Republic of Bulgaria, another Member State or a third country which is included in a list approved by the Deputy-Chairman of the FSC only in the following or similar exceptional cases:
 - In case of a disproportionately large subscription of new Fund units against cash on the primary market;
 - In case of low market liquidity;
 - High market, political or systemic risk that may affect the ETF management in normal market conditions;
 - The ETF may invest temporarily its free funds in securities under this item if the Management Company assesses that any of the afore-mentioned risks is present, but the Management Company is required within 6 months to rebalance the portfolio in order to replicate the Reference Index as close as possible.

Investment restrictions

The restrictions applicable to the Fund's investments under the law and the Rules of the Fund are listed below.

1. Expat Bulgaria SOFIX UCITS ETF seeks to replicate the composition of the SOFIX Index which meets the following conditions:
 - The index composition is sufficiently diversified;
 - The index represents an adequate benchmark for the market to which it refers, and

- It is published in an appropriate manner.
- 2. As a passive index tracker fund, in compliance with the afore-mentioned conditions, the “Expat Bulgaria SOFIX UCITS ETF” has no other restrictions except for 20% in equities, part of the Reference Index, issued by one entity, in compliance with Art. 46, para. 1 of ACISOVA.

The Fund strives to follow the Reference Index and it is possible that the allocation of shares in the ETF deviates from that of the Reference Index at times of exceptional market conditions, change of the structure of the Reference Index, an order for subscription or redemption of the Fund, low market liquidity and low trading volume, etc. The MC performs any rebalancing of the portfolio of Fund in the interests of the investors and according to the Fund's mandate to track the Reference Index. In order to comply with legal limitations and maintain liquidity, and to meet redemption requirements, the Fund will maintain a minimum level of cash and equivalents, which limits the weight of shares to replicate the Reference Index

- 3. The Management Company may not invest more than 20 percent of the Fund’s assets in deposits in one bank;
- 4. The risk exposition of Fund to the counterparty in a deal deriving from effective portfolio management techniques cannot exceed 10% of the assets when the counterparty is a bank defined under Art. 38 para 1. item 6. of ACISOVA, and 5% of the assets in all other such cases.
- 5. The total amount of investments under para 2-3 in securities or money-market instruments issued by a single entity and deposits with this entity, and exposure due to effective portfolio techniques should not exceed 20 percent of the amount of Fund's assets;
- 6. The Management Company may invest up to 30 percent of the Fund's assets in securities and money-market instruments issued by a single issuer if the securities and money-market instruments are issued or guaranteed by the Republic of Bulgaria, by another Member State, by their local authorities, by a third country or a public international organization in which at least one Member State is a member.
- 7. The parties belonging to one group for the purposes of preparation of consolidated financial statements in accordance with the recognised accounting standards are regarded as a single entity in applying the restrictions under items 3-5.
- 8. The Fund may acquire no more than:
 - 8.1. Ten percent of the equity shares without voting rights issued by one entity;
 - 8.2. Ten percent of the bonds and other debt securities issued by one entity;
 - 8.3. Ten percent of the money-market instruments issued by one entity.

Restrictions under para. 7.2 and 7.3 shall not apply upon receipt of the described instruments the Management Company acting on behalf of the Fund is not able to evaluate the total amount of the debt securities, money market instruments or the net amount of the issued debt securities.

- 9. The above-mentioned_restrictions shall not apply in exercising subscription rights attributed to securities and money-market instruments that are part of the Fund’s assets.

In case of violation of the investment restrictions for reasons beyond the control of the Management Company, the MC shall notify the Commission within 7 days of detection of the violation and provide a schedule of measures such that assets shall be brought in line with the law requirements not later than six months from the occurrence of the violation.

Requirements for the securities, money-market instruments and other assets under Art. 38 of ACISOCIVA and for the structure of the assets and liabilities, and liquidity of the Exchange-traded Fund

The Fund may, in accordance with the law, purchase or sell securities with the agreement to sell them or alternatively buy them back from the seller/buyer under the requirements of Art. 27 and 28 of ACISOCIVA and the Financial Collateral Arrangements Act (these transactions are generally known as repurchase or repo transactions). These contracts may be executed under different conditions with respect to their term, the redemption price and collateral, depending on the situation and the agreement reached with the specific counterparty. Such contracts could optimize the profitability and liquidity of the ETF, and their counterparties must meet the pre-defined by the MC creditworthiness requirements.

The Management Company shall follow the guidelines in Section X of the Guidelines on Exchange-Traded Funds (ETFs) and other UCITS issues (ESMA/2014/937). The Management Company shall not use derivative instruments in the management and structure of the ETF and therefore all guidelines related to these instruments are not relevant. Expat Bulgaria SOFIX UCITS ETF may use techniques and instruments related to securities and money-market instruments under the conditions and restrictions set out in this Prospectus and the Fund Rules, but in any case, these techniques shall not lead to a deviation from the investment objectives of the Fund or impose additional risks to the original policy risks as described in this Prospectus and the Fund Rules. When and if such actions are to be undertaken, Expat Bulgaria SOFIX UCITS ETF will ensure that it is able at any time to take back the securities lent or terminate any agreement entered for the lending of securities. Term repo and reverse repo agreements, the duration of which does not exceed seven days, shall be considered transactions whose conditions enable the ETF to take back the securities at any time. The annual financial statements of Expat Bulgaria SOFIX UCITS ETF shall also include details on:

- A. the risk exposure due to efficient techniques for portfolio management;
- B. the identity of the counterparty/counterparties of these efficient techniques for portfolio management;
- C. type and amount of collateral received by the UCITS to reduce the exposure to the counterparty; and
- D. revenues as a result of efficient techniques for portfolio management for the whole reporting period along with direct and indirect operating costs and fees incurred.

The Management Company shall conduct regular stress-tests annually – until the 15th day each first month of the year, or when the Management Company decides, if the market circumstances require it. These stress-tests facilitate the assessment of the liquidity risk of the Fund in exceptional market conditions. Within 30 days after the completion of the stress-tests, the Management Company shall notify the Deputy-Chairman of the FSC about the results and the actions taken to modify the existing rules, if necessary.

Measurement of financial assets

1. All financial instruments are initially measured at fair value plus or minus, in the case of a financial asset or financial liability not at fair value through profit or loss, transaction costs.

2. BASIS OF PREPARATION OF THE FINANCIAL STATEMENTS

The financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) which comprise financial reporting standards and interpretations of the International Financial Reporting Interpretations Committee of IFRS (IFRIC) as approved by the International Accounting Standards Board (IASB) and the International accounting standards and interpretations of the Standing Interpretations Committee (SIC), approved by the International Accounting Standards Committee (IASC), which are effectively in force as of 1 January 2005 and adopted by the European Union and promulgated for implementation in Bulgaria in Bulgarian language, the commonly spoken language in the country.

Since the afore-mentioned standards and/or interpretations came into effect for fiscal periods starting 1st January 2017, there have been no amendments in the accounting policy with the exception of new and more extensive already established disclosure without these leading to further changes – in classification or evaluation of accounting objects and operations.

The new and/or amended standards and interpretations affecting the Fund's accounting policy include:

IAS 7 (changed) Cash flow statements-related to the initiative for disclosure (coming to effect for annual periods from the 1st January 2017- not accepted by the EC). This change is an important clarification of the standard itself regarding the information given to the users of the financial statements who will become more acquainted with the liquidity and the financial operations of the company. The change requires additional disclosure and clarifications to be made concerning the changes in liabilities of the company related to: (a) changes in the financial activity as a result of operations leading to changes in the cash flows; or (b) changes as a result of non-cash transactions, such as acquisitions and exemptions, loading interest charges, effects from exchange rate differences, changes of the fair values, and the like. Changes in the financial assets should be included in that disclosure if cash flows stemming from this are disclosed in the financial activity (for example, hedge operations). The addition of changes in other objects as a part of the disclosure is allowed and they should be listed separately.

IFRS 7(changed) Financial instruments: Disclosures - related to the relief for re-calculation of comparative periods and the disclosures of the application of IFRS 9 (coming to effect for annual periods from the 1st January 2018 - not accepted by the EC) related to them. This change is connected to the establishment of the relief concerning the necessity of re-calculation of the comparative financial statements and to the opportunity of introducing modified disclosures in the transition from IAS 39 to IFRS 9 (when this happens) depending on the date of the application of the standard by the company and whether it chooses the option to re-calculate its previous periods.

IFRS 9 Financial instruments (coming to effect for annual periods from the 1st January 2018 - accepted by the EC). This standard is a new standard for financial instruments. Its final intended application is to entirely replace the IAS 39. The project for the replacement with the new standard

has gone through three phases: phase 1 Classification and valuation of financial assets and liabilities; phase 2 Hedge accounting; phase 3 Methodology for determining impairment. Currently, IFRS 9 has been issued four times, in November 2009, in October 2010, in November 2013 and finally in July 2014. Phase 1 Classification and valuation of the financial assets and liabilities-with the first issue, it changes these parts of the IAS 39 which are related to the classification and the valuation of financial instruments. It establishes new principles, rules and criteria for classification, valuation and disposal of financial assets and liabilities, including hybrid contracts. IAS 9 requires the classification of financial assets to be based on the business model of the entity's management and the characteristics of the contracted cash flows of the selected assets. It defines two major categories of estimates – at an amortized cost and at a fair value. The new rules will lead to changes in accounting of the financial assets such as debt instruments and financial liabilities acquired at fair value through profit or loss (for credit risk). A specification in the classification of the valuation model for financial assets at fair value is the additional category – fair value through the other comprehensive income (for some debt and capital instruments). Phase 2 Hedge accounting – for this purpose a new chapter to IFRS 9 is accepted, with which a new hedge accounting model has been adopted allowing consistent and comprehensive coverage of all financial and non-financial risk exposures subject to hedging operations and in addition a better presentation of risk management activities in the financial statements, specifically their relationship with the hedging transactions and the scope and type of documentation used. The requirements for the structure, the content and presentation approach to hedge disclosure have been approved. Furthermore, an option to account for changes in fair value of personal debt, measured at a fair value through profit or loss, but in the portion resulted from changes in the quality of debt availability of the company itself. Entities applying IAS 39 will be able to accept these options as a policy, as well they will be able to continue applying the requirements for the fair value hedge accounting on interest rate exposure by the rules stated of IAS 39, even after IFRS 9 comes into effect. Phase 3 Methodology for determining impairment – the change offers to apply “expected loss” model. According to this model, all expected losses on one depreciable financial instrument (asset) are accrued on three levels, depending on the change in its credit quality and not only at the time of event occurring, as it is in the current IAS 39 model. The three phases are: upon initial recognition of the financial asset – impairment over 12 months period or over the asset's lifetime; and accordingly – upon the occurrence of factual impairment. Moreover, they define how to measure losses in the case of impairment and respectively applying the effective interest rate.

Functional Currency

The functional and reporting currency of the Fund is Bulgarian Lev (BGN). With the introduction of the Euro, BGN is fixed at a rate of BGN 1.95583/ EUR 1.

Cash is available in the bank account as at 31.12.2017.

3. DETERMINATION OF FUND'S NET ASSET VALUE

Net asset value per share is the basis for determining the issue value and the redemption price of the shares. The net asset value of the Fund is calculated by deducting the amount of the liabilities from the total amount of the assets.

The net asset value and net asset value per share are determined each day of the week and published on the day of the revaluation which is the business day following the revaluation date.

4. INCOME AND EXPENSES RECOGNITION POLICY

Income is valued at fair value of the received or pending to receive payment or reimbursement. Income is accrued upon receipt of information from Custodian.

Expenses stemming from the activity of the Fund are reported in the Statement of Comprehensive Income following the accrual basis principle.

Expenses in a period stemming from the activity of the Fund (Operating expenses) which are paid indirectly by Fund's unitholders, i.e. management fee and custody fees are charged daily in compliance with the contracts between the Management Company and the Custodian.

Management fee – daily on the basis of the Fund's assets.

Not included in the Statement of Comprehensive Income:

Expenses stemming from investments in Fund units which are paid directly by the particular investor/unitholder at subscription and redemption of units ("Transaction costs") are charged as a liability on the account of the client and the Management Company.

Note on expenses for unitholders:

When at redemption of units of a collective investment scheme managed by the Management Company the net redemption amount is invested in one or more of the other collective investment schemes managed by the Management Company no redemption and subscription fees are charged. In this case subscription and redemption orders are executed at net asset value per share.

Financial income and expenses are included in the income statement, reported net and consist of: interest income and expenses, fees also for transactions with financial assets.

5. MANAGEMENT COMPANY AND RELATED PARTIES

Expat Capital AD holds the majority of the capital of MC Expat Asset Management EAD. BD members have no special rights to acquire stocks and bonds of the company.

Related parties to the Management Company:

- Expat Group EOOD – stockholder, owner of 49.00% of the capital of Expat Capital AD;
- Dextra Investments EAD – stockholder, owner of 33.00% of the capital of Expat Capital AD;
- Kamen Kirov – stockholder, owner of 9.00% of the capital of Expat Capital AD
- Gergana Sarbova – stockholder, owner of 9.00% of the capital of Expat Capital AD
- Expat Capital AD – single owner of the capital of Expat Asset Management EAD.

The interest of BD members in commercial companies as unlimited liability partners, the holding of more than 25 per cent of the capital in another company, as well as their participation in the management of other companies or co-operatives, such as procurement holders, managers or Board Members are listed below:

Nikola Simeonov Yankov (BD member of MC Expat Asset Management EAD) is related to the following legal entities:

- Grenada OOD – manager and partner;
- Zonata AD – representative and BD member;
- Simol EAD – representative and BD member;
- Expat Capital AD – representative and BD member;
- Dextra Investments EAD – stockholder, representative and BD member;
- Expat Alpha AD – representative and BD member;
- Eminent EOOD – manager and single owner of the capital;
- Sunshine Family Trust AD – BD member and managing director.

Nikolay Vassilev Vassilev (Managing director and BD member of MC Expat Asset Management EAD) is related to the following legal entities:

- Expat Group EOOD – single owner of the capital;
- Expat Capital AD – representative and BD member;
- Expat Alpha AD – representative and BD member.

Lachezar Dimitrov Dimov (BD member of MC Expat Asset Management EAD) is not related to legal entities.

Maria Dimitrova Boychinova (BD member of MC Expat Asset Management EAD) is not related to legal entities.

Nikola Emilov Veselinov (BD member of MC Expat Asset Management EAD) is related to the following legal entities:

- NLN Services OOD – manager and representative

There are no transactions closed with related parties throughout the year except for purchase and sale of shares on a regulated stock market.

As of 31.12.2017 the capital of Expat Capital AD - sole owner of the capital of Expat Asset Management EAD, consists of two types of stocks: a) 1 276 800 (one million two hundred seventy-six thousand and eight hundred) ordinary registered voting stocks; and b) 60,000 (sixty thousand) preferred registered non-voting stocks distributed among the stockholders as follows:

Stockholders	Voting stocks		Non-voting stocks	
	number	%	number	%
“Expat Group” EOOD	625 632	49.00	0.00	0.00
“Dextra Investments” AD	421 344	33.00	0.00	0.00
Kamen Kirov	114 912	9.00	0.00	0.00
Gergana Sarbova	114 912	9.00	0.00	0.00
“Expat Capital” AD	0.00	0.00	60 000	100.00
Total	1 276 800	100.00	60 000	100.00

6. FINANCIAL ASSETS

Initial recognition - when the Fund becomes a party to the contractual provisions of the instrument. The Fund recognizes the financial assets in the following categories as described by IAS 9, para 4.1.1:

- financial assets at amortised cost
- financial assets at fair value in profit or loss or in other comprehensive income

Subsequent to initial recognition the Fund shall measure financial assets including derivatives through profit or loss with the exception of the following types of assets:

- financial assets measured at fair value through profit or loss;
- loans and receivables measured at amortised cost through the method of effective interest rate
- held-to-maturity investments measured at amortised cost through the method of effective interest rate

Subsequently to initial recognition, the entity shall measure financial assets, including derivatives that are assets, at their fair value through profit or loss, without deducting transaction costs that could incur in sale or other disposal, except for the following types of assets:

- loans and receivables that are measured at amortised cost using the effective interest method;
- held-to-maturity investments that are measured at amortised cost using the effective interest method; and
- investments in equity instruments that do not have a quoted market price in an active market and whose fair value cannot be reliably measured.

7. RISK PROFILE AND RISK MANAGEMENT

Risk profile

Risk profile of investment and risk factors. Investing in Fund's shares is associated with high risk as "Expat Bulgaria SOFIX UCITS ETF" will mainly invest in stocks which traditionally are associated with a higher risk level. The main risks of investing in shares of "Expat Bulgaria SOFIX UCITS ETF" are:

Market risk

The possibility of loss occurring due to adverse changes in the securities prices, market interest rates, exchange rates and other. This market risk affects the net asset value of the ETF which will also fluctuate as a result of changes in the market prices of the equities and other securities in which the ETF has invested.

Extreme market movements

The market price of the financial instruments in which the Fund invests may fluctuate due to changes in the economic and market environment, the monetary policy of the central banks, the business activity of the issuers, the industry in which the issuer operates and the demand and supply on the stock market. At certain times, the market price of the Fund units on the stock exchange may fluctuate substantially. In the event of significant movements of the Index incl. large daily movements, the performance of the Fund may depart from its investment objectives. The valuation of the Fund will fluctuate as a result of changes in the price of the Fund's assets and the Reference Index.

Inability of the Management Company to adapt to market changes

The fund follows a passive investment strategy, i.e. it is not actively managed. As a result, the Management Company will not change the composition of the portfolio, except to follow closely the total return of the Reference Index. The Fund is not trying to outperform the market and does not take defensive positions when the market falls or is considered overvalued. Therefore, a decline in the Reference Index may lead to a decline in the value of the Fund's assets.

Liquidity risk

The risk associated with the possibility of losses or missed profits by mandatory or forced sales of assets in adverse market conditions (such as low demand in the presence of oversupply).

Purchase and redemptions

If the purchase and redemption orders for Fund units are received late or do not meet the requirements in the Prospectus and the Fund Rules, there will be a delay between the time of placing the order and the actual date on which the purchase or redemption is executed. Such delays may lead to a decrease in the number of units purchased or amounts received from redemptions.

Trading on a stock exchange

There can be no guarantees that the Fund will be approved for trading on a regulated market and/or that units of the Fund will continue to be traded or that the criteria for admission to trading will not change. Moreover, trading of the units on a stock exchange may be suspended under the rules of the respective exchange due to market conditions, and investors may not be able to sell their units until trading resumes.

Regulatory risk

The Prospectus has been prepared in compliance with the applicable laws and regulations. The Management Company and/or the Fund and its investment objectives and policies may be affected by future changes in laws and regulations. New or modified laws, rules and regulations in Bulgaria or the European Union could prevent or significantly limit the Fund's ability to invest in certain instruments. They could also prevent the signing of agreements with certain third parties.

This may affect the ability of the Fund to fulfil the respective investment objectives and policies. Applying such new or modified laws, rules and regulations could lead to an increase of all or some of the Fund's costs and may require the restructuring of the Fund, in order to meet the new rules. Such a restructuring may include restructuring costs. When restructuring is not possible, the Fund may proceed to termination. The assets of the Fund and the Reference Index are subject to change in laws or regulations and/or such changes might affect their value and/or liquidity.

Operational risk

It is associated with the potential of loss resulting from errors or system failures in the organization, insufficiently qualified personnel, unfavourable external events that are not financial in nature, incl. legal risk.

Tracking error risk

Tracking the Reference Index by investing in all positions in the index can be costly and difficult to implement. The portfolio manager may use optimization techniques such as selection of individual positions in the Index in proportions that differ from those in the Index. The use of such optimization techniques can increase the tracking error and lead to a different performance of the Fund compared to that of the Index. Furthermore, existing restrictions or future changes in laws and regulations of the Fund about, but not limited to, the composition, concentration and method of assets valuation can lead to the inability of the Fund to replicate the Index in full. Also, exchange-traded funds in markets characterized by low liquidity may be exposed to a higher tracking error.

Reference Index

If there is an event that affects the Index, the Fund may be required to suspend the issuance and redemption of units. The valuation of the Fund may also be affected. In case of continuing problems with the Index, the Fund will take appropriate actions, which may reduce the net asset value of the Fund.

Systemic risks

Systemic risks depend on general fluctuations in the economy and the markets in general. The Fund cannot influence the systemic risks but registers them and takes them into account. Risks arising from the political and economic situation are possible instability or military actions in the region. Disasters and accidents are factors complicating any system of risk management. The consequences are hard to predict, but access to information and the implementation of a system for forecasting and actions in extreme situations are possible ways to mitigate the negative effects.

8. RELATIONSHIP WITH THE MANAGEMENT COMPANY

Payments to the Management Company "Expat Asset Management" EAD are effected pursuant to signed contracts and represent:

- Remuneration under contract for management of the operations of "Expat Bulgaria SOFIX UCITS ETF".

- Expenses on issue and redemption of stocks of “Expat Bulgaria SOFIX UCITS ETF“

9. STATEMENTS OF THE MANAGEMENT

No payments to government have been effected by the Fund during the reporting period that exceed BGN 195 600 as one-off payment or series of related payments.

The management of the Fund declares that, to the best of its knowledge and belief, the financial statements prepared in accordance with the applicable accounting standards fairly reflect the information about the assets and liabilities, the financial position and profit or loss.

Enclosure 2: Notes to the Financial statements:

Expat Bulgaria SOFIX UCITS ETF

FINANCIAL INSTRUMENTS	NUMBER	31.12.2017 BGN'	Change in fair value per unit
Advance Terrafund REIT	1 418 454	3 119 180	3,92%
Albena AD	35 192	2 234 410	0,90%
Industrial Capital Holding	295 553	620 661	
Industrial Holding Bulgaria AD	977 863	1 441 370	
M+C Hydraulic AD	833 872	790 511	(7,65%)
Monbat AD	236 426	1 909 849	21,53%
Neochim AD	198 575	2 020 501	8,70%
First Investment Bank AD	14 084	774 620,00	(7,72%)
Sopharma AD	470 820	2 662 958	69,25%
Stara Planina Holding AD	881 407	958 971	
Trace group Hold АД	1 050 999	4 502 480	43,72%
Bulgarian Real Estate Fund REIT	343 426	2 750 842	21,73%
Chimimport AD	502 938	1 118 534	(3,84%)
Varna Holding AD	1 863 911	3 334 537	6,59%
Central Cooperative Bank AD	820 487	1 362 829	11,70%
TOTAL	9 944 007	29 602 253	

CASH

	31.12.2016 BGN'	31.12.2017 BGN'
Cash in bank accounts, BGN	4 686 000	1 589 181
Cash in deposits	0	0

4 686 000	1 589 181

RECEIVABLES

	31.12.2016 BGN	31.12.2017 BGN'
Receivables from interest		
Receivables from transactions with securities		417
Receivables from dividends		
	0	417

EQUITY

	31.12.2016 BGN'	31.12.2017 BGN'
Shares par value	22 630 000	25 400 000
Premiums on issue of shares	2 386 192	2 872 940
Retained earnings		464 788
Profit for the period	464 788	2 424 452
	25 480 979	31 162 180

CURRENT LIABILITIES

	31.12.2016 BGN'	31.12.2017 BGN'
To the Management company	0	26 298
To Custodian	789	1 053
To Financial broker	1 697	2 320
	2 486	29 671

FINANCIAL INCOME

	31.12.2016 BGN'	31.12.2017 BGN'
Dividend income	0	809 077
Income from transactions with financial assets, including:		
Interest income	1 403 239	3 166 864
	895	8 419
	1 404 134	3 984 359

FINANCIAL EXPENSES

	31.12.2016 BGN'	31.12.2017 BGN'
Loss from transactions with financial assets, including:		
Expenses related to currency transactions	831 388	1 166 020
Other	21	0
	65 341	319 031
	896 750	1 485 051

EXPENSES FOR OUTSOURCING

	31.12.2016 BGN	31.12.2017 BGN'
CSD fees	496.8	52
FSC fees	628.06	
BSE fees	19 299.99	1250
Service contracts	54 153.67	6 126.54
	74 855.91	7 428.54

The management of the Fund declares that, to the best of its knowledge and belief, the financial statements prepared in accordance with the applicable accounting standards fairly reflect the information about the assets and liabilities, the financial position and profit or loss.

Gergana Andonova **Lachezar Dimov**
Head of Accounting **Member of the Board of Directors**

Nikola Veselinov
Member of the Board of Directors