

**Al Rajhi Commodities Mudaraba Fund –  
United States Dollar  
(Managed by Al Rajhi Capital)**

**AUDITED FINANCIAL STATEMENTS AND  
INDEPENDENT AUDITOR'S REPORT**

**FOR THE YEAR ENDED 31 DECEMBER 2020**



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**INDEPENDENT AUDITOR'S REPORT  
TO THE UNITHOLDERS OF  
AL RAJHI COMMODITIES MUDARABA FUND - UNITED STATES DOLLAR  
(MANAGED BY AL RAJHI CAPITAL)**

**Opinion**

We have audited the financial statements of Al Rajhi Commodities Mudaraba Fund - United States Dollar (the "Fund") managed by Al Rajhi Capital (the "Fund Manager"), which comprise the statement of financial position as at 31 December 2020, and the statement of comprehensive income, changes in equity attributable to the unitholders and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Fund as at 31 December 2020, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards that are endorsed in the Kingdom of Saudi Arabia and other standards and pronouncements that are endorsed by the Saudi Organization for Certified Public Accountants.

**Basis for Opinion**

We conducted our audit in accordance with International Standards on Auditing that are endorsed in the Kingdom of Saudi Arabia. Our responsibilities under those 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 professional code of conduct and ethics endorsed in the Kingdom of Saudi Arabia that are relevant to our audit of the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Responsibilities of Management and Those Charged with Governance for the Financial Statements**

Management is responsible for the preparation and fair presentation of the financial statements in accordance with International Financial Reporting Standards that are endorsed in the Kingdom of Saudi Arabia and other standards and pronouncements that are endorsed by the Saudi Organization for Certified Public Accountants and the applicable provisions of the Investment Funds Regulations issued by the Board of the Capital Market Authority, and the Fund's terms and conditions and the Information Memorandum, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

Those charged with governance are responsible for overseeing the Fund's financial reporting process.





**INDEPENDENT AUDITOR'S REPORT  
TO THE UNITHOLDERS OF  
AL RAJHI COMMODITIES MUDARABA FUND - UNITED STATES DOLLAR  
(MANAGED BY AL RAJHI CAPITAL) (CONTINUED)**

**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 International Standards on Auditing that are endorsed in the Kingdom of Saudi Arabia will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with International Standards on Auditing that are endorsed in the Kingdom of Saudi Arabia, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the 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 cast significant doubt on the Fund's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our 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 Fund to cease to continue as a going concern.



**INDEPENDENT AUDITOR'S REPORT  
TO THE UNITHOLDERS OF  
AL RAJHI COMMODITIES MUDARABA FUND - UNITED STATES DOLLAR  
(MANAGED BY AL RAJHI CAPITAL) (CONTINUED)**

**Auditor's Responsibilities for the Audit of the Financial Statements (continued)**

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

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

for Ernst & Young

Rashid S. AlRashoud  
Certified Public Accountant  
License No. 366

Riyadh: 22 Sha'aban 1442H  
(4 April 2021)



# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Statement of financial position

As at 31 December 2020

		<b>31 December 2020</b>	<b>31 December 2019</b>
	<i>Note</i>	<b>USD</b>	<b>USD</b>
<b>ASSETS</b>			
Cash and cash equivalents	5	<b>10,659,065</b>	12,455,905
Financial assets at fair value through profit or loss (FVTPL)	6	<b>20,519,021</b>	10,229,444
Financial assets measured at amortised cost	7	<b>184,254,716</b>	135,601,017
Accrued special commission		<b>566,547</b>	925,142
<b>TOTAL ASSETS</b>		<b><u>215,999,349</u></b>	<b><u>159,211,508</u></b>
<b>LIABILITIES</b>			
Management fee payable	8	<b>26,696</b>	55,760
Accrued expenses	9	<b>9,697</b>	12,590
<b>TOTAL LIABILITIES</b>		<b>36,393</b>	68,350
<b>EQUITY</b>			
Net assets attributable to the unitholders of redeemable units		<b><u>215,962,956</u></b>	<b><u>159,143,158</u></b>
<b>TOTAL LIABILITIES AND EQUITY</b>		<b><u>215,999,349</u></b>	<b><u>159,211,508</u></b>
Redeemable units in issue		<b><u>92,741</u></b>	<b><u>69,299</u></b>
Net asset value attributable to each unit		<b><u>2,328.67</u></b>	<b><u>2,296.47</u></b>

The accompanying notes 1 to 17 form an integral part of these financial statements.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Statement of comprehensive income

For the year ended 31 December 2020

	<i>Note</i>	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
<b>INCOME</b>			
Special commission income		<b>2,706,359</b>	4,242,998
Net unrealized gain on financial assets at FVTPL		<b>123,603</b>	37,890
Net realized gain on financial assets at FVTPL		<b>150,066</b>	280,722
<b>TOTAL INCOME</b>		<b>2,980,028</b>	4,561,610
<b>EXPENSES</b>			
Management fees	8	<b>(467,038)</b>	(708,082)
Other expenses	10	<b>(19,921)</b>	(18,031)
<b>TOTAL EXPENSES</b>		<b>(486,959)</b>	(726,113)
<b>NET INCOME FOR THE YEAR</b>		<b>2,493,069</b>	3,835,497
<b>OTHER COMPREHENSIVE INCOME FOR THE YEAR</b>		-	-
<b>TOTAL COMPREHENSIVE INCOME FOR THE YEAR</b>		<b>2,493,069</b>	3,835,497

The accompanying notes 1 to 17 form an integral part of these financial statements.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Statement of changes in equity

For the year ended 31 December 2020

	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
<b>EQUITY AT THE BEGINNING OF THE YEAR</b>	<b>159,143,158</b>	149,009,083
Net income for the year	<b>2,493,069</b>	3,835,497
Other comprehensive income for the year	-	-
Total comprehensive income for the year	<b>2,493,069</b>	3,835,497
Issue of units during the year	<b>115,792,756</b>	49,641,755
Redemption of units during the year	<b>(61,466,027)</b>	(43,343,177)
Net change from unit transactions	<b>54,326,729</b>	6,298,578
<b>EQUITY AT THE END OF THE YEAR</b>	<b>215,962,956</b>	159,143,158
	<u><i>Units</i></u>	<u><i>Units</i></u>
<b>REDEEMABLE UNIT TRANSACTIONS</b>		
Transactions in redeemable units during the year are summarised as follows:		
<b>UNITS AT THE BEGINNING OF THE YEAR</b>	<b>69,299</b>	66,521
Issue of units during the year	<b>49,990</b>	21,962
Redemption of units during the year	<b>(26,548)</b>	(19,184)
Net increase in units	<b>23,442</b>	2,778
<b>UNITS AT THE END OF THE YEAR</b>	<b>92,741</b>	69,299

The accompanying notes 1 to 17 form an integral part of these financial statements.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Statement of cash flows

For the year ended 31 December 2020

	<i>31 December</i> <b>2020</b> <i>USD</i>	<i>31 December</i> <b>2019</b> <i>USD</i>
<b>Operating activities</b>		
Net income for the year	<b>2,493,069</b>	3,835,497
<i>Adjustments to reconcile net income to net cash flows used in operating activities:</i>		
Movement in unrealised gain on financial assets at FVTPL	<b>(123,603)</b>	(37,890)
<i>Working capital adjustments:</i>		
(Increase) decrease in financial assets at FVTPL	<b>(10,165,974)</b>	785,964
Decrease (increase) in accrued special commission	<b>358,595</b>	(333,711)
Decrease in management fee payable	<b>(29,064)</b>	(7,593)
(Decrease) increase in accrued expenses	<b>(2,893)</b>	2,690
Net cash flows (used in) from operating activities	<b>(7,469,870)</b>	4,244,957
<b>Investing activities</b>		
Purchase of financial assets measured at amortised cost	<b>(180,842,000)</b>	(133,075,000)
Proceeds from maturity of financial assets measured at amortised cost	<b>132,188,301</b>	91,596,228
Net cash flows used in investing activities	<b>(48,653,699)</b>	(41,478,772)
<b>Financing activities</b>		
Proceeds from issuance of units	<b>115,792,756</b>	49,641,755
Payment on redemption of units	<b>(61,466,027)</b>	(43,343,177)
Net cash flows from financing activities	<b>54,326,729</b>	6,298,578
<b>Net decrease in cash and cash equivalents</b>	<b>(1,796,840)</b>	(30,935,237)
Cash and cash equivalents at the beginning of the year	<b>12,455,905</b>	43,391,142
<b>Cash and cash equivalents at the end of the year</b>	<b>10,659,065</b>	12,455,905
<b><u>Operational cash flows from special commission income:</u></b>		
Special commission income received	<b>3,064,954</b>	3,909,287

The accompanying notes 1 to 17 form an integral part of these financial statements.



# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements

At 31 December 2020

### 1. INCORPORATION AND ACTIVITIES

Al Rajhi Commodities Mudaraba Fund – United States Dollar (the “Fund”) is an open-ended investment fund created by an agreement between Al Rajhi Capital (the “Fund Manager”), a wholly owned subsidiary of the Al Rajhi Banking and Investment Corporation (the “Bank”), and investors (the “Unitholders”) in the Fund. The address of the Fund Manager is as follows:

Al Rajhi Capital, Head Office  
8467 King Fahad Road, Al Muruj District  
P.O. Box 2743  
Riyadh 11263  
Kingdom of Saudi Arabia

The Fund is designed for investors seeking current income consistent with the preservation of capital and liquidity. The assets of the Fund are invested in Murabaha funds and in Murabaha transactions executed in accordance with Sharia principles. Murabaha comprises purchases of goods and commodities from approved suppliers against immediate payment and selling them to reputed organisations on deferred payment terms, thereby generating a profit. All the trading profits are reinvested in the Fund. The Fund was established on 14 December 1990.

The Fund has appointed AlBilad Investment Company (the “Custodian”) to act as its custodian. The fees of the custodian are paid by the Fund.

The Fund Manager is responsible for the overall management of the Fund's activities. The Fund Manager can also enter into arrangements with other institutions for the provision of investment, registrar or other administrative services on behalf of the Fund.

Based on historical information, between 20% and 40% of the Fund's units are redeemed throughout the year.

### 2. REGULATING AUTHORITY

The Fund is governed by the Investment Fund Regulations (the “Regulations”) issued by the Capital Market Authority (“CMA”) on 3 Dhul Hijja 1427H (corresponding to 24 December 2006) and effective from 6 Safar 1438H (corresponding to 6 November 2016) by the New Investment Fund Regulations (“Amended Regulations”) published by the CMA on 16 Sha'aban 1437H (corresponding to 23 May 2016) detailing requirements for all funds within the Kingdom of Saudi Arabia.

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES

#### 3.1 Statement of compliance

These financial statements have been prepared in accordance with International Financial Reporting Standards (“IFRS”) as issued by the International Accounting Standards Board (“IASB”), as endorsed in the Kingdom of Saudi Arabia and other standards and pronouncements issued by the Saudi Organization for Certified Public Accountants (“SOCPA”) (collectively referred to as “IFRS as endorsed in the KSA”).

#### 3.2 Basis of preparation

The financial statements are prepared under the historical cost convention, using the accruals basis of accounting except for certain investments which are held at FVTPL that are measured at fair value. These financial statements are presented in United States Dollars (“USD”), which is the Fund's functional currency. All financial information presented has been rounded to the nearest USD.

#### 3.3 Significant accounting policies

The significant accounting policies adopted in the preparation of these financial statements are consistent with those followed in the preparation of the Fund's annual financial statements for the year ended 31 December 2019, except for the adoption of new standards effective as of 1 January 2020. The Fund has not early adopted any standard, interpretation or amendment that has been issued but not yet effective.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

Several amendments and interpretations apply for the first time in 2020, but do not have an impact on the financial statements of the Fund.

##### *Amendments to IFRS 7, IFRS 9 and IAS 39: Interest Rate Benchmark Reform*

The amendments to IFRS 9 and IAS 39 Financial Instruments: Recognition and Measurement provide a number of reliefs, which apply to all hedging relationships that are directly affected by interest rate benchmark reform. A hedging relationship is affected if the reform gives rise to uncertainties about the timing and or amount of benchmark-based cash flows of the hedged item or the hedging instrument.

The amendments do not have any impact on the financial statements of the Fund.

##### *Amendments to IAS 1 and IAS 8: Definition of Material*

The amendments provide a new definition of material that states, “information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general-purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity.”

The amendments clarify that materiality will depend on the nature or magnitude of information, either individually or in combination with other information, in the context of the financial statements. A misstatement of information is material if it could reasonably be expected to influence decisions made by the primary users. These amendments had no impact on the financial statements of, nor is there expected to be any future impact to the Fund.

##### *Conceptual Framework for Financial Reporting issued on 29 March 2018*

The Conceptual Framework is not a standard, and none of the concepts contained therein override the concepts or requirements in any standard. The purpose of the Conceptual Framework is to assist the IASB in developing standards, to help preparers develop consistent accounting policies where there is no applicable standard in place and to assist all parties to understand and interpret the standards. This will affect those entities which developed their accounting policies based on the Conceptual Framework. The revised Conceptual Framework includes some new concepts, updated definitions and recognition criteria for assets and liabilities and clarifies some important concepts. These amendments had no impact on the financial statements of the Fund.

The following are the significant accounting policies applied by the Fund in preparing its financial statements.

##### *Cash and cash equivalents*

Cash and cash equivalents in the statement of financial position comprise cash on hand and short-term deposits in banks that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value, with original maturities of three months or less.

Short-term investments that are not held for the purpose of meeting short-term cash commitments and restricted margin accounts are not considered as “cash and cash equivalents”.

For the purpose of statement of cash flows, cash and cash equivalent include bank balances.

##### *Financial instruments*

###### *(i) Classification*

In accordance with IFRS 9, the Fund classifies its financial assets and financial liabilities at initial recognition into the categories of financial assets and financial liabilities discussed below.

In applying that classification, a financial asset or financial liability is considered to be held for trading if:

- (a) It is acquired or incurred principally for the purpose of selling or repurchasing it in the near term or
- (b) On initial recognition, it is part of a portfolio of identified financial instruments that are managed together and for which, there is evidence of a recent actual pattern of short-term profit-taking or
- (c) It is a derivative (except for a derivative that is a financial guarantee contract or a designated and effective hedging instrument).

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

##### *Financial assets*

The Fund classifies its financial assets as subsequently measured at amortised cost or measured at fair value through profit or loss on the basis of both:

- The entity's business model for managing the financial assets
- The contractual cash flow characteristics of the financial asset
- Financial assets measured at amortised cost  
A debt instrument is measured at amortised cost if it is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows and its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- Financial assets measured at fair value through profit or loss (FVTPL)  
A financial asset is measured at fair value through profit or loss if:
  - i. Its contractual terms do not give rise to cash flows on specified dates that are solely payments of principal and interest on the principal amount outstanding (SPPI); and
  - ii. It is not held within a business model whose objective is either to collect contractual cash flows, or to both collect contractual cash flows and sell; or
  - iii. At initial recognition, it is irrevocably designated as measured at FVTPL when doing so eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases.
- The Fund investments classified as FVTPL includes an investment in mutual fund instruments which are acquired principally for the purpose of generating a profit from short-term fluctuations in price.

##### *Financial liabilities*

- Financial liabilities measured at fair value through profit or loss (FVTPL)  
A financial liability is measured at FVTPL if it meets the definition of held for trading. The Fund does not hold any financial liabilities measured at FVTPL.
- Financial liabilities measured at amortised cost  
This category includes all financial liabilities, other than those measured at fair value through profit or loss.

##### *(ii) Recognition*

The Fund recognises a financial asset or a financial liability when it becomes a party to the contractual provisions of the instrument.

Purchases or sales of financial assets that require delivery of assets within the time frame generally established by regulation or convention in the market place (regular way trades) are recognised on the trade date, i.e., the date that the Fund commits to purchase or sell the asset.

##### *(iii) Initial measurement*

Financial assets and financial liabilities at FVTPL are recorded in the statement of financial position at fair value. All transaction costs for such instruments are recognised directly in profit or loss.

Financial assets and liabilities (other than those classified as at FVTPL) are measured initially at their fair value including any directly attributable incremental costs of acquisition or issue.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

##### *Financial instruments (continued)*

##### *(iv) Subsequent measurement*

After initial measurement, the Fund measures financial instruments which are classified as at FVTPL, at fair value. Subsequent changes in the fair value of those financial instruments are recorded in net gain or loss on financial assets and liabilities at FVTPL in the statement of comprehensive income. Special commission income and dividends earned or paid on these instruments are recorded separately in special commission income or expense and dividend income or expense in the statement of comprehensive income.

##### *(v) Derecognition of financial instruments*

A financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) is primarily derecognised (i.e. removed from the Fund's statement of financial position) when:

- The rights to receive cash flows from the asset have expired; or
- The Fund has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; and either (a) the Fund has transferred substantially all the risks and rewards of the asset, or (b) the Fund has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When the Fund has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement, it evaluates if and to what extent it has retained the risks and rewards of ownership.

When it has neither transferred nor retained substantially all of the risks and rewards of the asset, nor transferred control of the asset, the Fund continues to recognise the transferred asset to the extent of the Fund's continuing involvement. In that case, the Fund also recognises an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Fund has retained.

The Fund derecognises a financial liability when the obligation under the liability is discharged, cancelled or expired.

##### *(vi) Offsetting of financial instruments*

Financial assets and financial liabilities are offset and the net amount is reported in the statement of financial position if, and only if, there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously. This is generally not the case with master netting agreements unless one party to the agreement defaults and the related assets and liabilities are presented gross in the statement of financial position.

##### *(vii) Impairment of financial assets*

The Fund assesses on a forward-looking basis the Expected Credit Losses ("ECL") associated with its financial assets, carried at amortised cost, the ECL is based on a 12-month ECL and lifetime ECL. The 12-month ECL is the portion of lifetime the ECLs that result from default events on a financial instrument that are possible within 12 months after the reporting date. However, when there has been a significant increase in credit risk since origination, the allowance will be based on the lifetime ECL.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

##### *Fair value measurement*

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- In the principal market for the asset or liability, or
- In the absence of a principal market, in the most advantageous market for the asset or liability

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

The Fund uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy. This is described, as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

- Level 1 - Quoted (unadjusted) market prices in active markets for identical assets or liabilities
- Level 2 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable
- Level 3 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognized in financial statements at fair value on a recurring basis, the Fund determines whether transfers have occurred between levels in the hierarchy by re-assessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each year. The Fund determines the policies and procedures for both recurring fair value measurement, and for non-recurring measurement.

At each reporting date, the Fund analyses the movements in the values of assets and liabilities which are required to be re-measured or re-assessed as per the Fund's accounting policies. For this analysis, the Fund verifies the major inputs applied in the latest valuation by agreeing the information in the valuation computation to contracts and other relevant documents. The Fund also compares the change in the fair value of each asset and liability with relevant external sources to determine whether the change is reasonable.

For the purpose of fair value disclosures, the Fund has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy, as explained above. Fair value related disclosures for financial instruments that are measured at fair value or where fair values are disclosed are discussed in Note 11.

##### *Trade date accounting*

All regular way purchases and sales of financial assets are recognized / derecognized on the trade date (i.e. the date that the Fund commits to purchase or sell the assets). Regular way purchases or sales are purchases or sales of financial assets that require settlement of assets within the time frame generally established by regulation or convention in the market place.

##### *Provisions*

Provisions are recognised when the Fund has an obligation (legal or constructive) arising from a past event, and the costs to settle the obligation are both probable and can be measured reliably. If the effect of time value of money is material, provisions are discounted using a current pretax rate that reflects, where appropriate, the risk specific to the liability. When discounting is used, the increase in the provision due to passage of time is recognised as finance costs.

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, a receivable is recognized as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured.



# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

##### *Accrued expenses*

Liabilities are recognized for amounts to be paid in the future for services received, whether billed by the suppliers or not. These are initially recognized at fair value and subsequently at amortized cost using the effective interest rate method.

##### *Redeemable units*

Redeemable units are classified as equity instruments when:

- The redeemable units entitle the Unitholder to a pro rata share of the Fund's net assets in the event of the Fund's liquidation
- The redeemable units are in the class of instruments that is subordinate to all other classes of instruments
- All redeemable units in the class of instruments that is subordinate to all other classes of instruments have identical features
- The redeemable units do not include any contractual obligation to deliver cash or another financial asset other than the Unitholder's rights to a pro rata share of the Fund's net assets
- The total expected cash flows attributable to the redeemable units over the life of the instrument are based substantially on the profit or loss, the change in the recognised net assets or the change in the fair value of the recognised and unrecognised net assets of the Fund over the life of the instrument

In addition to the redeemable shares having all of the above features, the Fund must have no other financial instrument or contract that has:

- Total cash flows based substantially on the profit or loss, the change in the recognised net assets or the change in the fair value of the recognised and unrecognised net assets of the Fund
- The effect of substantially restricting or fixing the residual return to the redeemable shareholders

The Fund continuously assesses the classification of the redeemable units. If the redeemable units cease to have all the features, or meet all the conditions set out, to be classified as equity, the Fund will reclassify them as financial liabilities and measure them at fair value at the date of reclassification, with any differences from the previous carrying amount recognised in net assets attributable to the Unitholders. If the redeemable units subsequently have all the features and meet the conditions to be classified as equity, the Fund will reclassify them as equity instruments and measure them at the carrying amount of the liabilities at the date of the reclassification.

The issuance, acquisition and cancellation of redeemable units are accounted for as equity transactions.

No gain or loss is recognised in the statement of comprehensive income on the purchase, issuance or cancellation of the Fund's own equity instruments

##### *Net assets value per unit*

Net assets value per unit as disclosed in the statement of financial position is calculated by dividing the net assets of the Fund by the number of units outstanding at year end.

##### *Management fees*

Fund management fees are recognised on accrual basis and charged to the statement of comprehensive income.

Fund management fees are charged at agreed rates with the Fund Manager and as stated in the terms and conditions of the Fund.

##### *Special commission income*

Special commission income including special commission income from non-derivative financial assets measured at amortised cost, are recognized in the statement of comprehensive income, using effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of financial instrument (or, when appropriate, a shorter period) to the carrying amount of the financial instrument on initial recognition. When calculating the effective interest rate, the Fund estimates future cash flows considering all contractual terms of the financial instrument, but not future credit losses.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

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## Notes to the financial statements (continued)

At 31 December 2020

### 3. BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES (continued)

#### 3.3 Significant accounting policies (continued)

##### *Net gain or loss on financial assets and liabilities at FVTPL*

Net gains or losses on financial assets and liabilities at FVTPL are changes in the fair value of financial assets and liabilities held for trading or designated upon initial recognition as at FVTPL and exclude special commission and dividend income and expenses.

Unrealised gains and losses comprise changes in the fair value of financial statements for the year and from reversal of the prior year's unrealized gains and losses for financial instruments, which were realized in the reporting year. Realised gains and losses on disposals of financial instruments classified as at FVTPL are calculated using the weighted average cost method. They represent the difference between an instrument's initial carrying amount and disposal amount, or cash payments or receipts made on derivative contracts (excluding payments or receipts on collateral margin accounts for such instruments).

##### *Foreign currencies*

Transactions in foreign currencies are translated into USD at the exchange rate at the dates of the transactions. Foreign exchange gains and losses arising from translation are included in statement of comprehensive income.

Monetary assets and liabilities denominated in foreign currencies are retranslated into USD at the exchange rate at the reporting date.

Foreign currency differences arising on retranslation are recognized in statement of comprehensive income as net foreign exchange losses.

##### *Expenses*

Expenses are measured and recognized as expenses on an accrual basis in the year in which they are incurred.

##### *Zakat and income tax*

Zakat and income tax is the obligation of the Unitholders and is not provided for in these financial statements.

#### 3.4 Standards issued but not yet effective

There are several amendments and interpretations that are issued, but not yet effective, up to the date of issuance of the Fund's financial statements. In the opinion of the Board, these will have no impact on the financial statements of the Fund. The Fund intends to adopt those amendments and interpretations, if applicable, when they become effective.

### 4. SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS

The preparation of the Fund's financial statements requires the use of judgement, estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the reporting date and the reported amounts of revenue and expenses during the year. Estimates and judgments are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

Significant areas where management has used estimates, assumptions or exercised judgements are as follows:

##### *Going concern*

The Board of Directors, in conjunction with the Fund Manager made an assessment of the Fund's ability to continue as a going concern and are satisfied that the Fund has the resources to continue in business for the foreseeable future. Furthermore, they are not aware of any material uncertainties that may cast significant doubt upon the Fund's ability to continue as a going concern. Therefore, the financial statements continue to be prepared on the going concern basis.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 4. SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

#### *Fair value measurement*

The fair value for financial instruments traded in active markets at the reporting date is based on their quoted price (mid price), without any deduction for transaction costs.

For all other financial instruments not traded in an active market, the fair value is determined using valuation techniques deemed to be appropriate in the circumstances. Valuation techniques include the market approach (i.e., using recent arm's length market transactions, adjusted as necessary, and reference to the current market value of another instrument that is substantially the same) and the income approach (i.e., discounted cash flow analysis and option pricing models making as much use of available and supportable market data as possible).

Fair value related disclosures for financial instruments that are measured at fair value or where fair values are disclosed are discussed in Note 11.

### 5. CASH AND CASH EQUIVALENTS

	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
Bank balances – current account	<b>659,065</b>	455,905
Short term murabaha placements with other banks with original maturity of three months or less	<b>10,000,000</b>	12,000,000
	<b>10,659,065</b>	12,455,905

### 6. FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS (FVTPL)

The composition of the investment's portfolio on the last valuation day of the year end is summarised below:

	<i>31 December 2020</i>			
	<i>% of Market Value</i>	<i>Cost USD</i>	<i>Market value USD</i>	<i>Unrealised gain USD</i>
Al Rajhi Commodity Mudaraba Fund – Saudi Riyal	<b>100.00</b>	<b>20,208,809</b>	<b>20,519,021</b>	<b>310,212</b>
	<i>31 December 2019</i>			
	<i>% of Market Value</i>	<i>Cost USD</i>	<i>Market value USD</i>	<i>Unrealised gain USD</i>
Al Rajhi Commodity Mudaraba Fund – Saudi Riyal	100.00	10,042,835	10,229,444	186,609

Investments in mutual funds are unrated. The Fund also does not have an internal grading mechanism. However, the Fund Manager seeks to limit its risk by monitoring each investment exposure and setting limits for individual investment.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

Notes to the financial statements (continued)

At 31 December 2020

## 7. FINANCIAL ASSETS MEASURED AT AMORTISED COST

	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
Murabaha placements with the other banks	<b>180,842,000</b>	132,375,000
Sukuk	<b>3,412,716</b>	3,226,017
	<b>184,254,716</b>	135,601,017

Murabaha placements with the other banks are composed of the following:

<u><i>31 December 2020</i></u>	<i>% of Value</i>	<i>Cost USD</i>
<b>Remaining maturity</b>		
<b>Up to 1 month</b>	15.68	<b>28,360,000</b>
<b>1-3 months</b>	38.87	<b>70,302,000</b>
<b>3-6 months</b>	28.23	<b>51,050,000</b>
<b>6-9 months</b>	13.30	<b>24,060,000</b>
<b>9-12 months</b>	3.92	<b>7,070,000</b>
	<b>100.00</b>	<b>180,842,000</b>

<u><i>31 December 2019</i></u>	<i>% of Value</i>	<i>Cost USD</i>
<b>Remaining maturity</b>		
Up to 1 month	18.75	24,825,000
1-3 months	52.34	69,280,000
3-6 months	15.31	20,270,000
6-9 months	7.55	10,000,000
9-12 months	6.05	8,000,000
	<b>100.00</b>	<b>132,375,000</b>

Sukuk is summarised below:

<i>As at 31 December 2020</i>	<i>Maturity date</i>	<i>USD</i>
State of Qatar Sukuk	18 January 2023	<b>1,005,749</b>
Sharjah Govt. Sukuk 2024	17 September 2024	<b>1,011,147</b>
Almarai Sukuk	5 March 2024	<b>700,000</b>
Mumtalakat Sukuk	21 January 2027	<b>495,820</b>
Sharjah Govt. Sukuk 2027	10 June 2027	<b>200,000</b>
		<b>3,412,716</b>

<i>As at 31 December 2019</i>	<i>Maturity date</i>	<i>USD</i>
State of Qatar Sukuk	18 January 2023	1,512,077
Sharjah Govt. Sukuk 2024	17 September 2024	1,013,940
Almarai Sukuk	5 March 2024	700,000
		3,226,017

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 8. TRANSACTIONS WITH RELATED PARTIES

#### A. Transactions and balances with Fund Manager

In the ordinary course of its activities, the Fund transacts business with Fund Manager and the Bank.

The Fund pays a management fee at a maximum rate of 16% per annum (2019: 16%) calculated on the Fund's special commission. The fee is intended to compensate the Fund Manager for administration of the Fund.

The management fees amounting to USD 467,038 includes VAT amounting USD 38,012 (2019: SR 708,082 includes VAT amounting USD 33,718) reflected in the statement of comprehensive income, represent the fees charged by the Fund Manager during the year as described above.

As at 31 December 2020, management fees amounting to USD 26,696 includes VAT amounting USD 3,482 (31 December 2019: USD 55,760 includes VAT amounting USD 2,655) are payable to the Fund Manager.

The units in issue at 31 December 2020 include Nil units held by the employees of the Fund Manager (31 December 2019: Nil units).

The units in issue at 31 December 2020 include Nil units held by the Fund Manager (31 December 2019: Nil units).

At the end of the year, the cash balance with the Bank is USD 645,337 (31 December 2019: USD 455,095).

In the normal course of business, the Fund places Murabaha investments with the Bank at prevailing market rates. Murabaha investments involve typically the purchase of a commodity by the Fund for the purpose of its re-sale. The re-sale and the related mark up over cost is agreed with a counterparty at the inception of the Murabaha transaction deals.

#### B. Transactions with Board of Directors

The independent directors are entitled to remuneration for their services at rates determined by the Fund's terms and conditions in respect of attending meetings of the board of directors or meetings of the Fund. Independent director's fees are currently USD 1,333 per meeting up to a maximum of 2 meetings per annum per director which is paid equally by all funds supervised by the board.

Board of Directors' fees amounting to USD 446 (31 December 2019: USD 379) was charged during the year. As at 31 December 2020, Board of Directors' fees amounting to USD 446 (31 December 2019: USD 379) is payable to the Fund's Board of Directors.

### 9. ACCRUED EXPENSES

	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
Accrued audit fees	6,729	9,800
Accrued CMA fees	2,000	2,000
Other expense	968	790
	<u>9,697</u>	<u>12,590</u>

### 10. OTHER EXPENSES

	<i>2020 USD</i>	<i>2019 USD</i>
Audit fees	10,734	9,800
CMA fees	2,000	2,000
Tadawul fees	1,400	1,400
Other expense	5,787	4,831
	<u>19,921</u>	<u>18,031</u>



# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 11. FAIR VALUE OF FINANCIAL INSTRUMENTS

The Fund has investments at fair value through profit or loss which is measured at fair values and are classified within level 2 of the fair value hierarchy. The Fund's financial liabilities consist of management fee payable. All other financial assets and liabilities are classified as amortized cost and management believes that the fair value of all other financial assets and liabilities at the reporting date approximate their carrying values owing to their short-term tenure and the fact that these are readily liquid. These are all classified within level 2 of the fair value hierarchy. There were no transfers between various levels of fair value hierarchy during the current year or prior year.

### 12. MATURITY ANALYSIS OF ASSETS AND LIABILITIES

The table below shows an analysis of assets and liabilities according to when they are expected to be recovered or settled respectively:

	<i>Within 12 months USD</i>	<i>After 12 months USD</i>	<i>Total USD</i>
<i>As at 31 December 2020</i>			
<b>ASSETS</b>			
Cash and cash equivalents	10,659,065	-	10,659,065
Financial assets at FVTPL	20,519,021	-	20,519,021
Financial assets measured at amortised cost	180,842,000	3,412,716	184,254,716
Accrued special commission	566,547	-	566,547
<b>TOTAL ASSETS</b>	<b>212,586,633</b>	<b>3,412,716</b>	<b>215,999,349</b>
<b>LIABILITIES</b>			
Management fee payable	26,696	-	26,696
Accrued expenses	9,697	-	9,697
<b>TOTAL LIABILITIES</b>	<b>36,393</b>	<b>-</b>	<b>36,393</b>
<i>As at 31 December 2019</i>			
<b>ASSETS</b>			
Cash and cash equivalents	12,455,905	-	12,455,905
Financial assets at FVTPL	10,229,444	-	10,229,444
Financial assets measured at amortised cost	132,375,000	3,226,017	135,601,017
Accrued special commission	925,142	-	925,142
<b>TOTAL ASSETS</b>	<b>155,985,491</b>	<b>3,226,017</b>	<b>159,211,508</b>
<b>LIABILITIES</b>			
Management fee payable	55,760	-	55,760
Accrued expenses	12,590	-	12,590
<b>TOTAL LIABILITIES</b>	<b>68,350</b>	<b>-</b>	<b>68,350</b>

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 13. FINANCIAL RISK MANAGEMENT

#### *Introduction*

The Fund's objective in managing risk is the creation and protection of unitholder's value. Risk is inherent in the Fund's activities, but it is managed through a process of ongoing risk identification, measurement and monitoring, subject to risk limits and other controls. The process of risk management is critical to the Fund's continuing profitability. The Fund is exposed to market risk (which includes foreign currency risk and special commission rate risk), credit risk and liquidity risk arising from the financial instruments it holds.

#### *Risk management*

The Fund's Manager is responsible for identifying and controlling risks. The Board of Directors supervises the Fund Manager and is ultimately responsible for the overall risk management of the Fund.

#### *Risk measurement and reporting system*

Monitoring and controlling risks is primarily set up to be performed based on limits established by the Board of Directors. These limits reflect the business strategy, including the risk that the Fund is willing to accept and the market environment of the Fund. In addition, the Fund Manager monitors and measures the overall risk in relation to the aggregate risk exposure across all risks type and activities.

#### *Risk mitigation*

The Fund's term and conditions has investment guidelines that set out its overall business strategies, its tolerance for risk and its general risk management philosophy.

#### *Concentration risk*

Concentration indicates the relative sensitivity of the Fund's performance to developments affecting a particular industry or geographical location. Concentrations of risk arise when a number of financial instruments or contracts are entered into with the same counterparty, or where a number of counterparties are engaged in similar business activities, or activities in the same geographical region, or have similar economic features that would cause their ability to meet contractual obligations to be similarly affected by changes in economic, political or other conditions. Concentrations of liquidity risk may arise from the repayment terms of financial liabilities, sources of borrowing facilities or reliance on a particular market in which to realise liquid assets. Concentrations of foreign exchange risk may arise if the Fund has a significant net open position in a single foreign currency, or aggregate net open positions in several currencies that tend to move together.

In order to avoid excessive concentrations of risk, the Fund's terms and conditions include specific guidelines to focus on maintaining a diversified portfolio. The Fund Manager is instructed to reduce exposure to manage excessive risk concentrations when they arise.

Notes 6 and 7 to the financial statements shows the Fund's concentration of investment portfolio.

#### *Credit risk*

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss. The Fund does not have a formal internal grading mechanism. Credit risk is managed and controlled by monitoring credit exposures, limiting transactions with specific counterparties and continually assessing the creditworthiness of counterparties. Credit risks are generally managed on the basis of external credit ratings of the counterparties. The Fund Manager seeks to limit its credit risk by monitoring credit exposure and by dealing with reputed counterparties.

The following table shows the Fund's maximum exposure to credit risk for components of the statement of financial position.

	<i>31 December 2020 USD</i>	<i>31 December 2019 USD</i>
Cash and cash equivalents	<b>10,659,065</b>	12,455,905
Financial assets measured at amortised cost	<b>184,254,716</b>	135,601,017
	<b><u>194,913,781</u></b>	<u>148,056,922</u>

**13. FINANCIAL RISK MANAGEMENT (continued)**

*Credit risk (continued)*

The Fund's financial assets subject to the expected credit loss model within IFRS 9 are only cash equivalents and financial assets measured at amortized cost.

The Fund has adopted the general approach. The management has conducted an impairment assessment based on the expected credit loss ("ECL") as required under IFRS 9, which included taking into account numerous variables. Based on the assessment, the management has assessed that the impairment loss under ECL is not significant against the carrying value of investment held at amortised cost at the reporting date.

*Liquidity risk*

Liquidity risk is the risk that the Fund will encounter difficulty in releasing funds to meet commitments associated with financial liabilities that are settled by delivering cash or another financial assets.

The Fund's terms and conditions provide for the terms of subscriptions and redemptions of units and it is, therefore, exposed to the liquidity risk of meeting Unitholder redemptions. The Fund Manager monitors the liquidity requirements on a regular basis and seeks to ensure that sufficient funds are available to meet any commitments as they arise.

The undiscounted value of all financial liabilities of the Fund at the reporting date approximate to their carrying values and all are to be settled within one year from the reporting date.

*Market risk*

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices - such as foreign exchange rates, special commission rates, mutual fund prices and other price risk.

The Fund's strategy for the management of market risk is driven by the Fund's investment objective as per Fund's terms and conditions. The Fund's market risk is managed on a timely basis by the Fund Manager in accordance with the policies and procedures in place. The Fund's market positions are monitored on a timely basis by the Fund Manager.

*Currency risk*

Currency risk is the risk that the value of a financial instrument may fluctuate due to change in foreign exchange rates. The Fund views the USD as its functional currency.

The Fund's financial assets and liabilities are denominated in USD and the Fund is not exposed to significant currency risk.

*Special commission rate risk*

Special commission rate risk is the risk that the financial instruments will fluctuate due to changes in the market special commission rates. The Fund is subject to special commission rate risk or future risks on its special commission bearing assets including its investments in Sukuk.

# AL RAJHI COMMODITIES MUDARABA FUND – UNITED STATES DOLLAR

## Notes to the financial statements (continued)

At 31 December 2020

### 13. FINANCIAL RISK MANAGEMENT (continued)

#### *Market risk (continued)*

The following table demonstrates the sensitivity of the Fund's profit or loss for the year to a reasonably possible change in interest rates, with all other variables held constant. There is no sensitivity effect on other comprehensive income (OCI) as the Fund has no assets designated as fair value through other comprehensive income or hedging instruments. In practice, the actual trading results may differ from the below sensitivity analysis and the difference could be significant.

#### *Change in profit rate*

	<i>Impact on profit or loss</i>	
	<i>31 December 2020</i>	<i>31 December 2019</i>
	<i>USD</i>	<i>USD</i>
Increase by 1%	<b>1,842,547</b>	1,356,010
Decrease by 1%	<b>(1,842,547)</b>	(1,356,010)

### 14. COMPARATIVE FIGURES

Certain of the prior year amounts have been reclassified to conform to the presentation in the current year.

### 15. IMPACT OF COVID-19

During March 2020, the World Health Organisation ("WHO") declared the Coronavirus ("COVID-19") outbreak as a pandemic in recognition of its rapid spread across the globe. This outbreak has also affected the GCC region including the Kingdom of Saudi Arabia. Governments all over the world took steps to contain the spread of the virus. Saudi Arabia in particular has implemented closure of borders, released social distancing guidelines and enforced country wide lockdowns and curfews.

In response to the rapid spread of the virus and the resulting disruption of some social and economic activities and business continuity, the Fund Manager has taken a series of preventive and precautionary measures, including activating of remote work to ensure the safety of its employees and their families.

As of the date of financial statements for the year ended 31 December 2020, the Fund's operations and financial results have witnessed impact due to the COVID-19 outbreak mainly as result of immaterial additional expected credit losses in the Fund's financial assets measured at amortised cost driven by changes in the macroeconomic factors and assumptions. The impact of the pandemic on the Fund's operations and financial results till the date of the financial statements has been reflected in the net assets value and investments value. These developments could further impact our future financial results, cash flows and financial condition and the Fund Manager will continue to assess the nature and extent of the impact on its business and financial results.

### 16. LAST VALUATION DAY

The last valuation day of the year was 31 December 2020 (year ended 31 December 2019: 31 December 2019).

### 17. APPROVAL OF THE FINANCIAL STATEMENTS

These financial statements were approved by the Fund's Board of Directors on 19 Sha'aban 1442H (corresponding to 1 April 2021).