Remuneration Policy

[effective date: 3 December 2021]

1. Scope and Purpose

Alpha Leonis Partners AG, Zurich ("**ALP**", the "**Company**") has established the present remuneration policy (the “**Policy**”), applicable to all its employees and officers, in the context of its activities as independent financial advisory firm. The objective of the Policy is to ensure that the remuneration of the officers and staff of the Company:

- is in line with applicable laws and regulations;
- is in line with the business strategy and value of the Company;
- is in line with the interests of its clients, and, with respect of clients being collective investment schemes (the “**Funds**”), with the investors in these Funds;
- does not to encourage risk-taking which is inconsistent with the risk profiles of the clients and of the Funds, including with respect to sustainability risks. A “**Sustainability Risk**” as defined in Article 2 (22) of the Sustainable Finance Disclosure Regulation (“**SFDR**” or the “**Regulation**”) is: “*an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment*”. Sustainability Risks, by nature, can often play out over long time horizons and are therefore well suited for integration with the Policy which is intended to reflect not just short-term value contribution but, more importantly, long-term value creation of business activities. However, ALP also recognises the risk that if not appropriately structured, the Policy and the incentives it creates could lead to negative impacts on Sustainability Risks. Sustainability Risks include (but are not limited to) the following:
    - environmental risks such as the impacts of environmental events such as increased flooding risks on operations of portfolio companies;
    - social risks such as impact of non-compliance with anti-slavery or working conditions laws and regulations by portfolio companies; and
    - governance risks such as inadequate management oversight of portfolio companies.
- is designed to avoid or manage conflicts of interest.

The Policy applies to the remuneration paid by the Company or the Funds to officers and employees of the Company (the “**Staff**”) – no distinction is made between officers and employees.

2. Remuneration Governance

The Policy has been prepared and adopted by the management of the Company, which is in charge, with the assistance of the line managers, to ensure its implementation.

The Policy will be reviewed by the management of the Company on an annual basis.

3. The 3 remuneration pillars

The structure of the remuneration of the Staff consists of:

- A fixed remuneration: the fixed remuneration is defined in accordance with market standards, taking into consideration inter alia the experience, skills and level of education of the Staff.

- A variable remuneration paid by the Company: this variable remuneration, allocated on a discretionary basis is determined based on a comprehensive review of the employees' contributions across various criteria and taking into consideration Sustainability Risks. These criteria are however applied in a differential way among the Staff as is appropriate to their impact on the Company's activities. The Company awards Staff variable discretionary bonuses on a semi-annual basis.

- Carried interest paid by the Funds: the Staff are eligible to benefit from the ALP Carried Interest Plans, whose terms and conditions, including vesting policy, are further described in respective terms of ALP Carried Interest Plans. The structure of the carried interest to be paid by a Fund to the Company is aligned with the interests of the investors in said Fund and fully disclosed in the Fund offering memorandum.

4. Disclosures

The Regulation is applicable from 10 March 2021 (the "**Application Date**"). The Regulation requires financial market participants such as the Company to provide information to investors with regards to the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment.

This Policy specifically addresses the obligation in Article 5 of the Regulation:

"Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites."