



Our Policies

U Fund Services S.à r.l. ("**UFS**" or the "**Company**") is a fully authorized Alternative Investment Fund Manager ("**AIFM**") under the Law of 12 July 2013, supervised by the Commission de Surveillance du Secteur Financier ("**CSSF**"). In accordance with applicable European and Luxembourg regulations, UFS has implemented a robust governance framework supported by comprehensive internal policies to ensure regulatory compliance, investor protection, and operational integrity.

Voting Rights Policy

This policy is established in accordance with the Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU of the European Parliament and of the Council on Alternative Investment Fund Managers (the "**AIFMD**") and Luxembourg applicable regulations. UFS exercises voting rights attached to instruments held in the portfolios of the AIFs it manages exclusively in the interest of investors and in line with each fund's investment strategy. Voting rights are exercised for the benefit of AIFs and their investors. All voting decisions comply with the fund's prospectus, constitutional documents, and governance framework. The records of voting events, decisions taken, and any related conflicts are maintained to ensure transparency and accountability.

Conflict of Interest Policy

In accordance with Article 14 of the AIFMD and CSSF Circular 18/698, UFS has implemented procedures to identify, prevent, manage, and disclose conflicts of interest. The policy applies to all staff, delegates, and relevant people. A register of conflicts is maintained and reviewed by the Compliance Officer and the Board. Escalation and disclosure procedures ensure transparency when organizational measures are insufficient.

Complaints Handling Policy

This policy complies with CSSF Regulation 16-07 and Circulars 17/671 and 18/698. UFS ensures that complaints are handled fairly, promptly, and transparently. A Conducting Officer acts as Complaints Officer and liaises with the CSSF. Complaints are logged, investigated, and resolved, with annual reporting and trend analysis performed to improve service delivery.

Remuneration Policy

In line with Article 13 of the AIFMD, ESMA Guidelines (ESMA/2013/201), and SFDR Article 5, UFS's remuneration policy promotes sound risk management and discourages excessive risk-taking. The policy includes fixed and variable components and is reviewed annually by senior management and the Board.

Data Protection Policy

This policy is aligned with Regulation (EU) 2016/679 (**GDPR**) and Luxembourg Data Protection Law. UFS ensures lawful, fair, and transparent processing of personal data. Measures include privacy by design, breach reporting, data subject rights, and oversight by a Data Protection Officer. Transfers outside the EU are subject to adequacy decisions or appropriate safeguards. Any data breach is reported to the CNPD and affected data subjects without delay.

Note: UFS reviews its policies annually and updates them in accordance with changes in regulation, operational structure, or investor needs.