

Fees and Charges Policy

Fees for the Services Provided

The Company's policies with respect to fees shall be set by the Board.

The fees shall be agreed with the Client and shall be completed in the Client services agreement. The Client shall be also provided with an indication of the expenses and other fees charged by third parties such as custodians, courier services, etc for which services the costs shall be borne by the Client.

Inducements

The Company's policy regarding inducements, as this is included below, shall be adhered to at all times. The adherence of this shall be monitored by the Internal Auditor:

The Company shall not, in relation to the provision of investment management and administration service to the Client, pay or be paid any fee or commission, or provide or is provided with any non-monetary benefit, other than the following:

- a. a fee, commission or non-monetary benefit paid or provided to or by the UCITS or a person on behalf of the UCITS;
- b. a fee, commission or non-monetary benefit paid or provided to or by a third party or a person acting on behalf of a third party, where the following conditions are satisfied:
- i. the existence, nature and amount of the fee, commission or benefit, or, where the amount cannot be ascertained ,the method of calculating that amount, must be clearly disclosed to the UCITS in a manner that is comprehensive, accurate and understandable, prior to the provision of the relevant service
- ii. the payment of the fee or commission, or the provision of the non-monetary benefit must be designed to enhance the quality of the relevant service and not impair compliance with the management company's duty to act in the best interests of the UCITS
- c. proper fees which enable or are necessary for the provision of the relevant service, including custody costs, settlement and exchange fees, regulatory levies or legal fees, and which, by their nature, cannot give rise to conflicts with the management company's duties to act honestly, fairly and professionally in accordance with the best interests of the UCITS and its unit-holders.

For any deviation from the policies of Company, the consent of the Board shall be required.

Fees calculation

Management and performance fees

- 1. Management and performance fees are calculated by the Administrator.
- a. The calculation method is entered in the system during the set-up of the Fund, based on the Fund's offering documents. The parameters would include the following information: fee percentage, frequency (monthly, quarterly, etc.), high-water mark, hurdle rate, etc.
- b. The information is reviewed for accuracy.
- 2. After the system has proven it correctly calculates the management and performance fees, the Administrator will rely on the calculation performed by the system and will perform additional checks on an ad hoc basis.

Administration service fees

The administration service fee is calculated automatically by the Administrator based on the agreement with the Fund. The parameters include relevant basis points per year, minimum fee and calculation basis. These parameters are entered during the set-up of the fund in the accounting system of the Administrator and reviewed on an ad hoc basis.

Fees for the provision of Investment Advice & Portfolio Management

Investment Advice

	Management Fee "STANDARD PRICING"	Special contract		
INVESTMENT PROFILE				
Conservative	1,10%			
Balanced	1,50%			
Growth	2,00%			
Performance fee	20%			

Portfolio Management

	Management Fee "STANDARD PRICING"	Special contract		
INVESTMENT PROFILE				
Conservative	1,10%			
Balanced	1,50%			
Growth	2,00%			
Performance fee	20%			

Note:

1. **Management fee**: it is calculated as a percentage of the assets under management. The percentage of the management fee is stated on an annual basis and it is billed quarterly.

2. **Performance fee**: it is calculated every quarter as a percentage of the positive difference between the portfolio value and the highest portfolio value during all the previous reference periods — any cash movements (deposits - withdrawals - transfers) are not taken into account. It is billed quarterly, in case the date of the observation, the portfolio value is higher than the highest portfolio value during all the previous reference periods

Performance fee examples

Period	Portfolio Value	Performance fee
Example 1	1.000.000€	N/A
Q (t)	900.000€	0€
Q (t+1)	950.000 €	0€
Q (t+2)	1.000.000€	0€
Q (t+3)		
Example 2		
Q (t)	1.000.000€	N/A
Q (t+1)	1.200.000€	40.000 €
Q (t+2)	1.100.000 €	0€
Q (t+3)	1.150.000 €	0€
Example 3		
Q (t)	1.000.000€	N/A
Q (t+1)	1.100.000 €	20.000 €
Q (t+2)	1.050.000 €	0€
Q (t+3)	1.200.000€	20.000€