



Compliance & Ethics Manual

The AlphaInvest Limited Compliance & Ethics Manual establishes the fundamental principles and behavioral standards expected from all employees, partners, and affiliates. It reinforces our commitment to integrity, transparency, and regulatory compliance across all business operations.

1. Code of Conduct

All AlphaInvest personnel must act with honesty, professionalism, and respect in all interactions. Employees must uphold the company's reputation and adhere strictly to applicable financial, ethical, and legal standards.

2. Ethical Standards

- 1 Operate with fairness, honesty, and transparency in all dealings.
- 2 Avoid behavior that could damage AlphaInvest's reputation or client trust.
- 3 Comply fully with anti-bribery, anti-corruption, and AML/CTF laws.
- 4 Treat all clients and colleagues with equality and respect, regardless of background.

3. Conflict of Interest

Employees must disclose any personal or financial interests that could influence their professional judgment. AlphaInvest prohibits employees from engaging in activities that conflict with the company's best interests or that of its clients.

4. Confidentiality & Data Protection

All confidential information acquired in the course of employment must be securely maintained and not disclosed to unauthorized parties. AlphaInvest complies with GDPR and global data protection laws to safeguard client and company data.

5. Compliance Oversight

AlphaInvest's compliance department oversees adherence to internal policies, regulatory requirements, and ethical obligations. The compliance officer has the authority to investigate any alleged breaches and recommend corrective measures.

6. Reporting Violations

Employees and stakeholders are encouraged to report any unethical behavior, misconduct, or policy violations. Reports can be made anonymously through the company's confidential

whistleblowing channels.

7. Disciplinary Measures

Violations of this manual may result in disciplinary action, including verbal warnings, suspension, termination, or referral to law enforcement authorities depending on the severity of the breach.

8. Continuous Improvement

AlphaInvest continuously updates its compliance and ethics programs to reflect new regulatory developments, technological advancements, and emerging industry best practices.