

INFORMATION MEMORANDUM

June 2019

For the open-ended alternative investment fund (AIF) by the name 3K MUTUAL FUND ANAGENISIS (AIF) aimed at retail investors (CYSEC Authorisation No. AIF32/ 2014)

THE ALTERNATIVE INVESTMENTS FUND (AIF) THIS INFORMATION MEMORANDUM RELATES TO IS NOT A UCITS

DECLARATIONS

- 1) The alternative investment fund by the name of 3K MUTUAL FUND ANAGENISIS (AIF) has been set up in the Republic of Cyprus and is supervised by the Cyprus Securities and Exchange Commission.
- 2) Investments in AIFs offer no guaranteed performance and past returns do not ensure future ones.
- 3) The value of investments in AIF units can go up or down, and the initial amount invested is not guaranteed.

The Cyprus Securities and Exchange Commission has checked the content of this Information Memorandum only in relation to whether it meets investor information needs, as set out in the Alternative Investment Fund Law and the relevant CYSEC Directives. This check is not a guarantee about the AIF's yield.

3K INVESTMENT PARTNERS Mutual Fund Management Co. S.A.	This Information Memorandum has been prepared on the basis of Greek Law 4209/2013, the Cypriot Law regulating Alternative Investment Funds and other related matters of 2018 (Law 124(I)/2018) and the relevant CYSEC decisions.
<i>(GCR No. 1003501000 - Ministry of Economy Decision No. K2-7642/15.10.1990)</i>	
25-29 Karneadou St., Athens GR-10675 Tel. 210 74 19 800 • Fax 210 74 19 847 Web www.3kip.gr	

This Information Memorandum and the annexes attached to it contain all information needed for investors to participate in the alternative investment fund (AIF) by the name of 3K

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MUTUAL FUND ANAGENISIS (AIF) which operates as a type of mutual fund (hereinafter the **Fund**) and which is managed by the mutual fund management company by the name of 3K Investment Partners Mutual Fund Management Co. S.A., whose registered offices are in Athens at 25-27-29 Karneadou St., Athens GR-10675, which has obtained an authorisation from and is supervised by the Hellenic Capital Market Commission.

This Information Memorandum is attached to and forms an integral part of the Regulations for the 3K MUTUAL FUND ANAGENISIS (AIF).

This Information Memorandum, the latest published annual report and the latest published half-yearly report and the Key Investor Information Document for the Fund are available on the Manager's website (www.3kip.gr), and on the website of persons participating in the network via which units in the Fund are sold. The above documents are also available at the Company's offices and the offices of persons participating in the network via which units in the Fund are sold.

Any information or statements not contained in this Information Memorandum and the Fund Regulations, which are an integral part hereof, are not binding on the Company.

This Information Memorandum is not an offer or exhortation to make investments where the persons making such an offer or exhortation are not authorised to do so.

The price of units in the Fund may vary and it is likely that there will not be positive returns. We wholeheartedly recommend that before investing in units in the Fund, you contact your investment advisor.

Investors' attention is drawn to the fact that the net value of Fund assets can be expected to be highly unstable because of the composition of its portfolio.

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GENERAL DESCRIPTION

3K INVESTMENT PARTNERS MUTUAL FUND MANAGEMENT Co. S.A. (hereinafter the **Company**) which manages the Fund, is a UCITS manager and an alternative investment fund manager (AFIM) whose registered offices are in Athens, Greece, has obtained the necessary authorisations and is supervised by the competent supervisory authority in its country of origin, namely the Hellenic Capital Market Commission (supervisory authority website: www.hcmc.gr). The duties of Fund Custodian are performed by the credit institution by the name of Eurobank Cyprus Ltd whose registered offices are in the Republic at 41 Archbishop Makarios Ave., 1065 Nicosia, and is supervised by the Central Bank of Cyprus.

The units in the Mutual Fund are **available** (a) in **Greece** directly from the Company via its certified sales reps and (b) in the **Republic of Cyprus** via the Company's certified sale reps and the limited liability company BOC ASSET MANAGEMENT LTD whose registered offices are in the Republic of Cyprus, 154 Limassol Ave., 2025 Strovolos Nicosia (Tax Reg. No. 10358706T, Companies Reg. No. HE 358706, website: www.am.bankofcyprus.com.cy) which has obtained authorisation No. UCITS 5/78/2012 and which is supervised by the Cyprus Securities and Exchange Commission.

Units in the Mutual Fund may also be sold via other sales networks in Greece or the Republic of Cyprus.

Before submitting an application to join the Fund we recommend that you carefully read the Key Investor Information Document, this Information Memorandum, and the Fund Regulations, which form an integral part of this Information Memorandum, and take into account the Fund's latest Annual and half-year report. Copies of those documents are posted on the website of the company 3K Investment Partners MFMC Co. S.A. (www.3kip.gr), on the websites of persons in the sales network for Fund units and are also available at the Company's offices (25-29 Karneadou St., Athens GR-10675, Greece) and the offices of persons in the sales network for Fund units. Applications can only be submitted in accordance with the terms, conditions and procedures outlined in this Information Memorandum and the Fund's Regulations.

The Company declares that it has not taken any of the steps specified by the Investment Company Act of 1940, amendments to it, and the Transferable Securities Act of 1933, and amendments to it, or any other transferable securities legislation, to register the Company or the mutual funds it manages with the US Securities and Exchange Commission. Consequently, this document cannot be imported into, transmitted or distributed in the USA or in its territories or acquisitions or be served on any US Person (permanent residents of the USA, companies or cooperatives in the USA or any other legal entities which have been established in accordance with the laws of the USA or are governed by them).

The Company declares that unitholder data and particulars collected when they join the Fund may, where appropriate, be transmitted to the competent officials at the Greek Ministry of Finance and/or the competent Cypriot authorities and exchanged with the competent tax authorities of another state or states where unitholders have their tax residence, in accordance with the provisions of Greek Law 4378/2016 or the relevant Cypriot legislation, applicable OECD regulations and transnational agreements on the exchange of information in the tax sector, including the transnational agreement between Greece and the USA on Foreign Account Tax Compliance (FATCA). Note that the information and data collected which may be transmitted in accordance with the above, in the context of automatic information exchanges shall be kept and stored by the Company

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and/or persons participating in the network via which units in the Fund are sold in a secure environment, solely and exclusively for the purpose for which it was intended, namely proper annual transmission to the competent authority, and shall be retained for the time period required to achieve that objective, and in all events, in accordance with the provisions on statute-barring and limitation contained in the applicable tax laws.

PROCESSING OF PERSONAL DATA

The Company processes personal data (hereinafter referred to as "Personal Data") of the unitholders of the alternative investment fund by the name of **3K MUTUAL FUND ANAGENISIS (AIF)** which operates in the form of a mutual fund, and other persons relating to holdings in Mutual Funds (hereinafter referred to collectively as "Data Subjects") which have been submitted or will be submitted by the Data Subjects themselves or their legal representatives or third parties (whether natural or legal person) or public bodies or which come from publicly accessible sources and/or files, where that data are needed for the purpose of data processing.

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data which has come to or may come to the Company's knowledge both in the context of its transactional relations with unitholders and in the context of information the Company receives from third parties (whether natural or legal persons) or public sector bodies, in the exercise of their legal rights or those of the Company.

The purposes for which the Company processes personal data are as follows:

- a)** to facilitate, support and monitor unitholders' holding in the Mutual Fund, based on the participation, redemption and redemption-re-investment application forms they submit.
- b)** to register, record and archive all manner of orders, applications and requests from unitholders of the Company provided in writing, electronically or by phone, in the context of their participation in the Mutual Fund.
- c)** in the context of Mutual Fund management, to fulfil the Company's obligations deriving from the legislative and regulatory framework applicable from time to time, and to comply with decisions of the competent supervisory, administrative, public and judicial-prosecution authorities and services.
- d)** to satisfy all manner of requests addressed to the Company by unitholders and to examine complaints from unitholders and
- e)** to send messages in hard copy and electronic format from the Company to unitholders for advertising/marketing purposes, where they have first given the Company specific consent for that.

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As a Controller of Personal Data the Company takes all necessary steps to comply at all times with the provisions of Regulation (EU) No 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation/GDPR) and the relevant legislative and regulatory framework applicable in Greece, including decisions, circulars, opinions and acts in general issued by the Hellenic Data Protection Authority.

Besides, any person who participates in the sales network for Fund units insofar as it operates as a Controller of Personal Data shall also take all necessary measures to comply at all times with the provisions of Regulation (EU) No 2016/679 and the relevant national legislative and regulatory framework in force. In cases where the said person undertakes on behalf of 3K Investment Partners the processing of personal data as a processor, it shall provide adequate assurances about implementation of suitable technical and organisational measures, in a way that processing meets the requirements in the GDPR and the legislative and regulatory framework applicable from time to time, and shall safeguard the protection of data subjects' rights.

Given that the Personal Data which the Company processes is only limited to the data strictly needed to achieve the processing purposes, any refusal by investors to provide the Company with such data will mean they are unable to acquire holdings in the Mutual Fund.

The recipients of the personal data of the Data Subjects may include: **i)** any credit institution which performs the duties of custodian/sub-custodian of the Mutual Fund managed by the Company, any intermediaries/sub-intermediaries for the sale of units in the Mutual Fund, and third parties - providers to whom the Company has outsourced under contract its functions in the context of the managing the Mutual Fund. **ii)** third parties to whom the Company has assigned in whole or in part the performance of personal data processing functions on its behalf, to better facilitate the management of the Mutual Fund, and compliance with the legislative and regulatory framework applicable from time to time. **iii)** third parties with whom the Company collaborates in carrying on its activities to perform its obligations in the context of managing the Mutual Fund. **iv)** any person to whom transmission of data is required under the applicable legislative and regulatory framework or on the basis of an administrative decision and **v)** the supervisory authorities competent for inspection and operation of the Mutual Fund and in general any public, administrative, supervisory, judicial, prosecution or other authority and service when performing its lawful duties.

In cases where the Company assigns a third party on its behalf the task of processing personal data (Processor) it shall only use persons who provide adequate assurances about implementation of suitable technical and organisational measures, in a way that processing meets the requirements in the GDPR and the legislative and regulatory framework applicable from time to time, and to safeguard the protection of data subjects' rights. Outsourcing in accordance with the above shall be done under a written contract signed by the Company and the processor, which binds the latter in relation to the Company, and as a minimum sets out, inter alia, the scope and duration of the processing, the nature and purpose of processing, the type of personal data and categories of data subjects, and the Company's obligations and rights as controller.

Personal Data can only be transmitted to third countries or international organisations where an adequate level of protection is ensured by the third country or international organisation. If that is no so, the Company may transfer

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personal data to a third country or international organisation *only* under the strict conditions set out in the GDPR.

The personal data of Company clients is subject to processing, and is held and stored by the Company in a secure environment solely and exclusively for the purposes intended and only for such time as is needed to achieve those purposes, subject to more specific provisions of the applicable legislation. In all events, the personal data of clients is held for 20 years from termination of the contractual relationship between the Company and the unitholder in any manner or from total redemption by the unitholder of all units in the Mutual Fund. Those time limits do not apply in the case of litigation, in which case the data retention periods extends until an irrevocable court judgment is handed down.

Data subjects have the following rights:

a) the right to information and to access the personal data relating to them and to obtain information about such, and the origin, purposes of processing, recipients or categories of recipients, and retention period,

b) the right to submit a request for rectification and to supplement any missing data.

c) the right to erasure of data, subject to the Company's obligations and lawful rights to retain data for a minimum specific period pursuant to the legislative and regulatory framework applicable from time to time,

d) the right to restrict processing of data where the accuracy of the data is contested or processing is unlawful, or there is no longer any purpose for processing it, provided that there are no lawful grounds for retaining the data.

e) the right to data portability to another controller, provided that processing is based on Client consent and is done using automated means, having regard to the fact that this right can be satisfied depends on the Company's lawful rights and obligations to retain data and the performance of its duties in the public interest) and

f) the right to object to the processing of data relating to them on grounds relating to their particular situation in cases where data is processed to perform a duty carried out in the public interest or for the purpose of the legitimate interests pursued by the Company or a third party.

In addition, Data Subjects may withdraw any consent for the processing of their data that has been given to the Company and to raise any other issue relating to their Personal Data with the Hellenic Data Protection Authority (1-3 Kifissias Ave., Athens/ contact@dpa.gr) and to submit a complaint it.

The Company has appointed a Data Protection Officer who participates appropriately and in time in all issues related to the processing of personal data. Requests from Data Subjects about their personal data and requests to exercise their rights must be submitted to the Company's Data Protection Officer at the email address dpo@3kip.gr or in writing to the Company's offices at 25-29 Karneadou St., Athens GR-10675, marked for the attention of the Data Protection Officer.

Detailed information about how the Company processes the Personal Data of investors in the Mutual Fund and in particular about the type of personal data processed, the legality and purpose of processing, the persons to whom data can be sent, the method and duration for which it is retained, and their rights as data subjects is available free of charge at the Company's registered offices (25-29

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Karneadou St., Athens GR-10675), at branches on the Mutual Fund distribution network and on the company's website www.3kip.gr, where one can find the Company documents entitled "**DATA PROCESSING NOTICE**" and "**PRIVACY POLICY**", in their most current version. Those documents may be unilaterally amended by the Company at its unfettered discretion and will be immediately posted in their most current version to the Company's website after any updates are made.

Upon acquiring units in the Mutual Fund, unitholders (as Data Subjects) acknowledge that prior to the submission of their application to join the Mutual Funds, they were given the **DATA PROCESSING NOTICE** by the Company and were told it is also available on the Company's website, whose terms they have been apprised of, understand, accept and which constitute an integral part of the Mutual Fund application form they submitted.

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Definitions	
Custodian	<p>The credit institution established in the Republic or in another Member State which carries on activities via a branch in the Republic and which performs the duties and competences specified in the Alternative Investment Fund Managers Law of 2013, set out in detail in Articles 85 et seq. of Regulation (EU) No 231/2013, and is also shall subject to the provisions of Articles 28(3) [Allocation of duties], 30(2) [Custodian's liability], and 32 to 34 of the Cypriot Law entitled "Law regulating Alternative Investment Funds and other related matters of 2018" (Law 124(I)/2018) (hereinafter the Law) [resignation of custodian, replacement of the Custodian and termination of the Custodian's duties].</p> <p>The duties of Fund Custodian are performed by the credit institution with the corporate name Eurobank Cyprus Ltd, whose registered offices are in the republic at 41 Archbishop Makarios Ave., Nicosia 1065.</p>
AIF	<p>AIF means an alternative investment fund which a) pools capital from a number of investors to invest it in accordance with a predefined investment policy for the benefit of investors and b) does not have a UCITS authorisation referred to in Article 5 of Directive 2009/65/EC.</p> <p>The Fund is an AIF within the aforementioned sense.</p>
Fund supervisory authority	<p>The Cyprus Securities and Exchange Commission - supervisory authority website: http://www.cysec.gov.cy/el-GR/home/</p>
Company	<p>The company with the corporate name 3K INVESTMENT PARTNERS MUTUAL FUND MANAGEMENT Co. S.A. is a UCITS manager and an alternative investment fund manager (AFIM) whose registered offices are in Athens, Greece, has obtained the necessary authorisations and is supervised by the competent supervisory authority in its country of origin, namely the Hellenic Capital Market Commission and operates in accordance with Greek Law 4209/2013.</p> <p>The Company was lawfully incorporated in accordance with the relevant Greek laws by decision No. K2-7642/15.10.1990 of the Greek Ministry of Development (Trade) and is entered in the General Commercial Registry held in Greece (GCR No. 1003501000 /ex Companies Reg. Companies Reg. No. 22671/06/B/90/27).</p> <p>Under AFIM authorisation No. 3/788/15.6.2017 from the Hellenic Capital Market Commission relating to the provision of management services for other collective investment undertakings not covered by Directive 2009/65/EC, in accordance with the provisions of Article 6(2)(b) of Greek Law 4209/2013, the Company has undertaken to manage the Fund within the meaning of Article 6(2)(b) of Greek Law 4209/2013.</p>

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Fund	<p>The fund by the name of 3K MUTUAL FUND ANAGENISIS (AIF), which:</p> <p>a) is an alternative investment fund (not a UCITS) whose Member State of origin is the Republic, which operates with one investment section and has obtained an operating permit as an alternative investment fund (AIF) in accordance with Chapter 2 of Part II of the Alternative Investment Funds Law of 2014 which has now been replaced by the Law entitled "Law regulating Alternative Investment Funds and other related matters of 2018" (Law 124(I)/2018) (hereinafter "Law").</p> <p>b) was set up on 08/06/2018, with initial assets of € 125,000 which was the minimum level of assets required at the time of establishment and which will amount to € 500,000 within 12 months of establishment of the Fund, by raising capital from investors, and with a unit price of € 5.</p> <p>c) was granted authorisation No. AIF32/2014 by the Cyprus Securities and Exchange Commission.</p> <p>d) is of unlimited duration commencing on 08/06/2018, which was the date the certificate from the Fund's Custodian that the initial assets had been deposited, was submitted to CYSEC and</p> <p>e) is governed by the provisions of the Law and its Regulations.</p> <p>The Fund is a pool of assets comprised of transferable securities, money market instruments and cash, whose individual assets belong indivisibly to more than one unitholder. The Fund is not a legal entity and its unitholders are represented both in and out of court in their legal relations arising from management of the Fund and their rights to its assets by the Manager. The latter manages the Fund in compliance with the provisions of the Law, Greek Law 4209/2013 and Regulation (EU) No 231/2013, acting when performing its duties, in the exclusive interests of unitholders. Mutual fund unitholders are not liable for the acts or omissions of the Company or the Custodian when those parties are discharging their duties.</p>
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1 The Company

1.1 General

The Company is a UCITS manager and an alternative investment fund manager (AFIM) whose registered offices are in Athens, Greece, has obtained the necessary authorisations and is supervised by the competent supervisory authority in its country of origin, namely the Hellenic Capital Market Commission. More specifically, the Company has obtained: a) an authorisation to provide UCITS management services under Directive 2009/65/EC (contained in Hellenic Capital Market Commission Decision No. 49/25.07/1990); b) an authorisation to provide investment portfolio management services based on Hellenic Capital Market Commission Board decision No. 15/340/01.06.2005, provided the portfolios include one or more financial instruments; investment advice about one or more financial instrument; and custodianship and logistics for units in collective investment undertakings; and c) an authorisation to provide

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management services for other collective investment undertakings not covered by Directive 2009/65/EC, in accordance with the provisions of Article 6(2)(b) of Greek Law 4209/2013, and to receive and transmit orders relating to financial instruments in accordance with Article 6(4)(b)(cc) of Greek Law 4209/2013 (contained in Hellenic Capital Market Commission Board Decision No. 3/788/15.06.2017).

Under authorisation No. 3/788/15.06.2017 from the Hellenic Capital Market Commission relating to the provision of management services for other collective investment undertakings not covered by Directive 2009/65/EC, in accordance with the provisions of Article 6(2)(b) of Greek Law 4209/2013, the Company has undertaken to manage the Fund within the meaning of Article 6(2)(b) of Greek Law 4209/2013.

The Company was lawfully incorporated in accordance with the relevant Greek laws by decision No. K2-7642/15.10.1990 of the Greek Ministry of Development (Trade) and is entered in the General Commercial Registry held in Greece (GCR No. 1003501000 /ex Companies Reg. Companies Reg. No. 22671/06/B/90/27). Pursuant to Hellenic Capital Market Commission decision No. 233/9-01-2015, read in conjunction with decision No. 8165/23-01-2015 of the Greek Ministry of Development, entered in the GCR on 23/01/2015 (Entry No. 296427) the Company's corporate name and trading name are as follows: "3K INVESTMENT PARTNERS MUTUAL FUND MANAGEMENT Co. S.A." trading as "3K INVESTMENT PARTNERS".

The Company's operating term has been set at 100 years from the date of incorporation.

The company's registered offices are in Greece at the following address: 25-27-29 Karneadou St., Athens GR-10675.

1.1.1 The Company's Board of Directors

The line-up of the Company's Board of Directors is shown in the table below

Georgios Koufopoulos	Chairman & CEO
Gerasimos Vasileiou	Vice Chairman, Executive Member
Theodoros Lizardos	Vice Chairman, Executive Member
Anna Margariti	Executive Member and Deputy CEO
Nikolaos Kampanis	Non Executive Member
Ioannis Zannas	Non Executive Member
Georgios Tachtalidis	Non Executive Member

1.1.2 Company executives/responsibilities

Georgios Koufopoulos	CEO & Chief Investment Officer
Anna Margariti	Deputy CEO

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Gerasimos Vasileiou	Chief Financial & Operations Officer
Theodoros Lizardos	Chief Sales Support, Marketing & PDM Officer
Panagiotis Karachristos	Head of Corporate Development & IT
Panagiotis Mitropoulos	Chief Direct Sales Officer
Eleni Hilari	Regulatory Compliance & Risk Management Officer
Katerina Mantziara	Internal Auditor
Marianna Afthinou	UCITS and AIF Manager
Konstantinos Fotinopoulos	UCITS and AIF Manager

The members of the Company's Board of Directors and the said executives do not engage in activities outside of the Company.

1.1.3 UCITS & AIF Investment Committee

Name	Post
Georgios Koufopoulos	President
Anna Margariti	Member
Anna Maria Afthinou	Member
Konstantinos Fotinopoulos	Member

1.1.4 Retail Client Portfolios Investment Committee

Name	Post
Georgios Koufopoulos	President
Anna Margariti	Member
Anna Maria Afthinou	Member
Konstantinos Fotinopoulos	Member
Panagiotis Mitropoulos	Member

1.1.5 Fund certified public accountants

The duties of certified public accountants for the Fund have been assigned to

Deloitte Limited
 HE162812
 24 Spyrou Kyprianou Avenue
 1075, Nicosia, Cyprus
 P.O. Box 21675
 1512 Nicosia, Cyprus

1.1.6 Company shareholders

The sole shareholder in the Company is **3K Investment S.A.**

1.1.7 Company share capital and equity

Given that the Company falls under Article 2(b) of Hellenic Capital Market Commission Decision No. 1/459/27.12.2007, its capital requirements are calculated in accordance with Article 3(3) of that Decision. In that context, the Company's objective is to safeguard and constantly monitor that it has equity which is equal or greater at all times to whichever of the following amounts is highest:

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- a) the sum of capital requirements for **credit risk** and **market risk**, in accordance with Hellenic Capital Market Commission Decisions No. 3/459, 4/459 and 5/459 and
- b) 25% of fixed costs over the last year, as defined in Annex I of Decision No. 1/459.

The Company's share capital stands at € 1,455,198.00 paid up in cash in full. On 31.12.2017 the Company's total equity stood at € 2,674,610.37, which fully meets the requirements in Article 9(7) of Law 4209/2013.

Shares in the Company are registered and are not traded on a regulated market within the meaning of Article 4(21) of Law 4514/2018.

Professional liability risk

The Company has defined the following risks as professional liability risks (risks which could arise from loss or damage caused by the competent staff by negligently carrying on activities the Company is legal responsible for):

- a) loss of documents which demonstrate ownership of the AIF;
- b) inaccurate or misleading statements to the AIF or its investors;
- c) acts, errors or omissions which lead to breach of (i) legal and regulatory obligations, (ii) the duty of skill and care to the AIF and its investors, (iii) fiduciary duties, (iv) the duty of confidentiality, and (v) the AIF's regulations or constitutional documents;
- d) failure to put in place, implement and keep in effect appropriate procedures to avoid dishonourable, deliberate or malicious acts;
- e) inappropriate asset valuations or calculations of share/unit prices;
- g) losses arising from the suspension of operations, system malfunctions, inadequate processing of transactions or management of procedures.

The Company has opted to cover its professional liability risks by taking out professional liability insurance.

1.1.8 Fund (AIF) Manager

Management of the AIF by the company entails managing investments (portfolio management and risk management) and in addition: a) administering the AIF, b) advertising the AIF and its commercial marketing and c) activities relevant to the AIF's assets. Note that in order for the Company to manage the Fund in light of the functions referred to above which are part of the concept of AIF management, the Company has delegated tasks in the manner specified in section 1.1.12 of this Information Memorandum.

When implementing the Fund's investment policy, the Company always acts in such a way that the investment risks are spread and unitholders benefit from the results generated by managing Fund assets.

The Company keeps records in which it registers all information about Fund assets and liabilities. The Fund's investment policy and objectives are described in detail in section 2.2 of this Information Memorandum. The Company is obliged to act at all times within the limits of the Fund's investment objectives and applicable investment policy.

The Company is entitled to decide to undertake management of new AIFs at any time. If it does so, the Information Memorandum will be updated and amended accordingly to include detailed information and data about the new AIFs.

1.1.9 Unitholder relations

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Customer Service for unitholders in the Fund is provided by Company employees certified to sell the Fund's units in Greece (Registered offices: 25-29 Karneadou St., Athens GR-10675) and by certified sales reps of the persons in the sales network for the Fund's units.

1.1.10 Summary of the Company's remuneration policy

1) The objective of the remuneration policy which the Company has adopted and implemented is to promote the rational, efficient management of risks, to discourage the assumption of excessive risks and risks incompatible with the risk profile, the regulations of Funds which the Company manages (UCITS and AIF) and to not prevent the Company from acting in the interests of the Funds it manages. The Company's remuneration policy has been prepared based on the provisions of the current legislative and regulatory framework governing UCITS (Greek Law 4099/2012) and AIF Management Companies (Greek Law 4209/2013) in Greece. Taking into account internal organisation, the nature, extent and complexity of the Company's operations and in compliance with Article 23b(3) of Law 4099/2012 and Article 13(4) of Law 4209/2013 respectively, the Company has not set up a Remuneration Committee.

2) The Company's Remuneration Policy includes fixed and variable components, both in relation to salaries and optional pension benefits and applies to the following categories of Company executives/employees.

- The members of the Board of Directors;
- Senior management executives;
- The Regulatory Compliance Officer;
- The Risk Management Officer;
- The Internal Auditor;
- Fund Managers (UCITS and AIF);
- Private portfolio managers;
- Management executives;
- Any Company employee who receives overall pay which puts him on the same pay scale as senior management and persons who assume risks, whose professional activities have a material impact on the Company's risk profile or the private portfolios or UCITS and AIF it manages.
- Any Company employee whose professional activities have a material impact on the Company's risk profile or the private portfolios or UCITS and AIF it manages.

3) The Company's Remuneration Policy (which includes among other things a detailed description of how pay and benefits are calculated, the identity of the persons responsible for providing them) is available on the Company's website at www.3kip.gr and printed copies are available free of charge upon request at the Company's offices in Athens Greece (25-29 Karneadou St.) and at locations where the Fund is sold, and may be obtained during business hours on working days.

1.1.11 Sales Network for mutual fund units

The Company may sell units in the Fund directly and/or via credit institutions, investment firms, UCITS managers and AIF managers.

A. Sale of Fund units in Greece

Units in the Fund are sold in Greece by the Company directly via its certified sales reps. The person who submitted an application to acquire units in the Fund will be

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registered as the Unitholder in the Register of Fund Unitholders held by the Company. Units in the Fund will be sold to **retail investors** in Greece **under the following conditions**: a) that the investors undertake to invest **at least € 100,000** in the Fund and b) the investors declare in writing in a document separate to the application form that **they are aware of and understand the risks** associated with investing in the Fund's units.

The conditions above do not apply to professional investors.

Note that a "retail investor" means an investor who is not a professional investor (*Note: "Professional investor" means any investor considered to be a professional client or who may following an application be treated as a professional client within the meaning of Annex II of Greek Law 4514/2018*).

B. Sale of Fund units in Republic of Cyprus

Units in the Fund are sold in the Republic either via the Company or via persons participating in the sales network for the Fund's units.

In the case where units in the Fund are sold directly via the Company or via persons participating in the sales network, the person who submits the application to acquire units in the Fund will be registered as the unitholder in the Register of Fund Unitholders held by the Company.

Where units in the Fund are sold via persons in the sales network, units may be sold by holding **omnibus accounts** in such a way that the beneficial owners are entered in the investment accounts which the person participating in the sales network opens in the name of each of them, for which it holds a special electronic file which includes all entries relevant to them, and the person participating in the sales network shall be entered in the Register of the Fund's Unitholder held by the Company (note though that the entry in the name of the person participating in the sales network on behalf of its clients shall be accompanied by the phrase "for clients").

In the context of the omnibus accounts described above, the persons participating in the sales network shall ensure that each Client who participates in the Fund via it can request the transfer of the investments in his own name by making a relevant individual entry in the Register of Unitholders.

1.1.12 Functions delegated by the Company to third parties

A. Under the written agreement the Company has signed with the limited liability company by the name of BOC ASSET MANAGEMENT LTD, whose registered offices in the Republic of Cyprus are at 154 Limassol Ave., 2025 Strovolos, Nicosia (VAT No.10358706T, Companies No. HE 358706), which has obtained UCITS authorisation No. 5/78/2012 and is supervised by the Cyprus Securities and Exchange Commission (hereinafter the **Broker**), the Company has delegated the Broker the task of:

- 1) managing AIF risks and liquidity;
- 2) providing and performing the following services and functions which are part of the **Fund management function** performed by the Company (which fall within the concept of AIF management);
 - (a) accounting for transactions in transferable securities and other financial instruments in the AIF portfolio, and related administrative services;
 - (b) Fund asset valuation and calculation of the value of units and their sale/redemption price; and
 - (c) provision of information, reports and data to the competent Cypriot authorities.

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B. Moreover, under the relevant written agreements between the Company and each person participating in the sales network for units in the Fund, that person may undertake: a) **to implement due diligence measures and procedures to prevent, suppress and combat money laundering** and terrorism financing, when selling units in the Fund in the Republic of Cyprus and b) **to implement due diligence measures and procedures in accordance with the provisions of Directive 2014/107/EU and Directive 2011/16/EU** on mandatory automatic exchanges of information in the tax sector, the **US Foreign Account Tax Compliance Act (FATCA)** and the **international rules issued by the OECD** as applied from time to time on the basis of the relevant national laws.

The delegation of such powers by the Company to the Broker entails no conflicts of interest given that Fund portfolio management activities continue to be performed by the Company.

1.2 Custodian

1.2.1 General

The duties of Fund Custodian are performed by the credit institution with the corporate name Eurobank Cyprus Ltd, whose registered offices are in the republic at 41 Archbishop Makarios Ave., Nicosia 1065, which is supervised by the Central Bank of Cyprus. Those duties are performed on the basis of a written agreement with the Company.

1.2.2 Duties of the Custodian

The Fund's custodian has the obligations, duties and competences specified in Article 24 of the Alternative Investment Fund Managers Law of 2013 which are set out in detail in Articles 85 et seq. of Regulation (EU) No 231/2013 and the relevant written agreement which has been signed with the Company. Those duties include, among other things:

- The obligation to properly monitor the Fund's cash flows.
- Safekeeping the Fund's assets.
- Ensuring that the sale, issuing, repurchase, redemption and cancellation of Fund units is done in accordance with the provisions of the law applicable to the Fund and the Fund's own regulations.
- Ensuring that the value of Fund units is calculated in accordance with the provisions of the law applicable to the Fund and the Fund's own regulations.
- Ensuring that Company instructions are executed in accordance with the provisions of the law applicable to the Fund and the Fund's own regulations.
- Ensuring that the price from transactions involving Fund assets is paid to it with the normal deadlines and
- Ensuring that the Fund's profits are distributed in accordance with the provisions of the law applicable to the Fund and the Fund's own regulations.

1.2.3 Delegation of functions to third parties

The Custodian may only delegate the safekeeping of all or part of the Fund's assets (not the other functions) to third parties provided the conditions in Article 26 of the Alternative Investment Fund Managers Law of 2013 are complied with.

Such delegation of the safekeeping of Fund assets may be done where the following conditions are met:

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- Those duties are not delegated in order to avoid requirements in the legislative and regulatory framework applicable to the Fund's Custodian.
- The Custodian can prove that there are objective reasons for such delegation.
- The Custodian has shown all due skill, care and diligence in selecting and appointing each third party to whom it intends to delegate part of its duties and continues to show all due skill, care and diligence in periodically re-examining and continuously checking any third party to whom it has delegated part of its duties and arrangements made by the third party relating to issues delegated to it and
- The Custodian shall ensure that the third party meets the conditions in Article 26(1)(d) of Alternative Investment Fund Managers Law of 2013, on a continuous basis when performing the duties delegated to it.

Delegation of safekeeping of Fund assets in accordance with the above is governed by the provisions of Article 26 of the Alternative Investment Fund Managers Law of 2013 and Articles 98 and 99 of Regulation (EU) No 231/2013.

1.2.4 Liability of the Custodian

The Custodian shall be liable to the Fund or investors in the Fund for loss by it or a third party to whom safekeeping of financial instruments has been delegated. Where financial instruments which were placed in safekeeping are lost, the Custodian shall promptly return a financial instrument of the same type or of corresponding amount to the Fund or Company on the Fund's behalf. The Custodian shall not be liable where it is in a position to prove that the loss was due to extraneous events which were reasonably beyond its control and whose consequences could not have been avoided no matter what effort was reasonably made to prevent them. The Custodian shall also be liable to the Fund or investors in the Fund for any losses sustained as a result of deliberate or negligent improper performance of duties in accordance with the legislation on the custodianship of AIFs applicable to it.

The Custodian's aforementioned liability shall not be affected by any delegation of safekeeping of the Fund's assets to a third party.

The Custodian may be released from liability where the conditions in Article 27(4) and ((5) of the Alternative Investment Fund Managers Law of 2013 apply, which are expanded upon in the provisions of Regulation (EU) No 231/2013.

Release of the Fund's Custodian from liability based on the relevant custody agreement.

The Custodianship Agreement for the Fund specifies that the Custodian is released of liability (a) in the case of slight negligence and (b) in the case of force majeure.

2 Risk management/investment policy/units/transactions.	management/management	methods/liquidity
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2.1 Risk management/management methods

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The Company uses risk management procedures that allow it to check and calculate the risks from positions it has taken and their impact on the Fund portfolio's overall risk exposure.

The Company also ensures that the overall risk to which the Fund portfolio is exposed does not exceed its net assets. Risk exposure is calculated based on the current value of the underlying assets, counterparty risk, future market movements and the time available to liquidate exposure.

The Fund cannot invest in derivative financial instruments nor can it make use of such for hedging purposes.

The method the Company uses to measure risks and to compute the overall exposure to risk the Fund portfolio it manages faces, is the **commitment approach**.

Liquidity management

Liquidity risk may arise due to the inability to liquidate assets in the Fund's portfolio within a reasonable time and at a reasonable price meaning the Fund cannot comply with its obligations. Given that the Company does not use derivatives for the Fund it manages, there are no underlying obligations which could affect its liquidity levels. The Fund the Company manages does not invest in low liquid assets such as real estate or cooperative interests. In addition, it does not use special arrangements when entering into transactions involving transferable securities. The transferable securities in which the Fund invests are traded on regulated markets and are highly liquid. In all events the Fund does have a percentage of its portfolio placed in cash assets to promptly cover any major redemption requests which may be submitted. The specific percentages of Fund cash assets are stated in the investment mandate and can be altered.

2.2 Investment objectives, Risks, and investment limits for the Fund

1. The Fund's investment objective is to achieve capital appreciation by investing primarily in equities of companies listed on Exchanges (regulated or other secondary markets).
2. To achieve that objective, the Fund invests at least 60% of its assets in equities in companies listed on Exchanges (regulated or other secondary markets) worldwide. (Note: a significant part of the Fund's assets will be invested in equities of companies listed on regulated or other secondary markets in Europe). The Fund may also invest in other transferable securities, money market instruments, bank deposits, and units or shares in collective investment undertakings (UCITS and/or AIF) worldwide. The Fund may also, to a lesser degree, hold liquid cash assets.
3. The Manager shall actively manage the Fund. The equities will be chosen having analysed and evaluated factors such as: prospects of growth, the company's value, the quality of management, dividend policy and other qualitative and quantitative criteria. In addition, emphasis is also placed on the financials for the sectors to which the companies belong, and the risks and opportunities entailed.

The Fund's benchmark index is the Eurostoxx 600 index.

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The return on the benchmark may differ significantly from the mutual fund's return. It does not seek to match the return of the benchmark.

4. **The Fund is considered to have a high investment risk** since the portfolio is primarily invested in equities which may fluctuate significantly. The main method for calculating risk is the composite risk and return index which takes into account weekly historical returns achieved by the Fund over the last 5 years.

5. The Fund is **aimed at retail investors with a long-term investment horizon** (of over 3 years) who wish to tie their investment into the performance and results of companies in whose equities the Fund's portfolio primarily invests.

6. **The material risks associated with the Fund are as follows**

- Market risk (the risk of market prices dropping and a consequent drop in the prices of certain of the transferable securities in the Fund portfolio) is high, given that investments in the Fund are made in equities in companies listed on Exchanges (organised or other secondary markets) worldwide which may record major fluctuations.
- The expected credit risk (the risk of an issuer of a debt security in which the fund has invested being unable to discharge its obligations) is low, because the Fund invests only slightly or not at all in debt securities.
- The Fund's liquidity risk is low. Liquidity risk arises when a specific investment is hard to liquidate thereby making it potentially difficult to liquidate units in the Fund.

The Company has put in place and follows suitable, effective procedures in order to be able at any moment to calculate and manage risks to which the Fund may be exposed to. The Fund **does not invest in derivative financial instruments nor can it make use of such for hedging purposes**. The Company ensures that the Fund's portfolio is suitably diversified and is not dependent to a large degree of one specific securities issuer.

7. The Fund is subject to the following **investment rules and limits** in terms of the said permissible investments:

A. General

- It shall not acquire shares with voting rights which allow it to exercise significant influence over management of an issuer. This restriction does not apply to Fund investments in collective investment undertakings (UCITS and/or AIF).
- It shall not acquire funds from investors via bond issues.
- It shall not issue loans or provide guarantees for third parties. This restriction shall not prevent the Fund from acquiring transferable securities that are not fully paid up.

B. Investments in transferable securities

- The Fund shall not invest more than 20% of its assets in transferable securities that are not listed on or are not the traded on a regulated market, which operates regularly and is recognised and open to the public.
- The Fund shall not invest more than 20% of its assets in transferable securities issued by the same issuer, except with CYSEC's permission, provided they are transferable securities issued or guaranteed by a state, federal state, local government authority, or by public international bodies which one or more states are a member of.

C. Investments in deposits

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- The Fund shall not invest more than 10% of its assets in deposits from the same organisation. That limit may rise to 30% max. provided they are deposits (a) with a credit institution which has obtained authorisation from a Member State and (b) at the custodian or at a credit institution associated with the custodian.

D. Investments in units of collective investment undertakings

- The Fund shall not invest in closed-ended collective investment undertakings but may invest up to 10% of its assets in open-ended collective investment undertakings which are subject to prudential supervision, provided the collective investment undertakings in which the Fund invests are prohibited from investing more than 20% of their assets in other collective investment undertakings.
- The Fund is not permitted to invest more than 10% of its assets in collective investment undertakings which are not subject to prudential supervision and to rules equivalent to those which apply in the laws of the Republic to protect retail investors.
- Where the Fund invests in units of other collective investment undertakings which are managed directly or by delegating management, the Manager or other company associated with the Manager in the context of joint management or joint control or qualifying holding, shall ensure that the Manager or other company does not apply sale, redemption or surrender commission for investments in Funds to units in those other collective investment undertakings.

2.3 UNITS

2.3.1 General points/ Applicable Law/Jurisdiction/Equal treatment of unitholders

The Fund's assets are divided into units. The number of units in circulation increases with the issuing and sale of new units, and reduces with the redemption of units. Units have the same value and entitle unitholders to the same rights.

Investments in the Fund's units shall be governed by the law of the Republic. Where there are any disputes concerning investments in the Fund's units the Courts of Athens shall be jurisdiction in the case of investments in Greece and the Courts of the Republic shall have jurisdiction in the case of investments in the Republic of Cyprus.

The Company shall ensure that unitholders in the Fund are treated equally and shall treat unitholders with the same characteristics the same. Differences are permitted where they relate to unitholders placed in different classes based on objective criteria. In all events any preferential treatment for one or more unitholders in the Fund shall not be permitted where it leads to the other unitholders in the Fund being placed at a general material disadvantage.

2.3.2 Proof of membership

Membership of the Fund shall be demonstrated by entering the relevant units and particulars of the holder or holders of this Fund units in the Unitholders Register held by Company in electronic format.

2.3.3 Rights of unitholders

Units in the Fund: are freely transferable.

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- Transfer of units in the Fund shall be notified to the Company which shall approve the transfer, which shall be completed and take effect from the date on which the Company approves it.
- can be pledged to secure claims. Pledges shall be valid in relation to the Company and shall generate effects from the moment establishment of the pledge is notified in writing to the Company. The pledgor shall be satisfied by redeeming the units which have been pledge and paying their value to the pledgor, until such time as all pledged units have been redeemed. Where all pledged units in the Fund are not redeemed, the pledgor shall retain its rights under the pledge for the other pledged units, without requiring the conclusion and notification of a new pledge agreement.

Where several persons participate in the Fund as joint owners of units, each of the joint owners may make full or partial use of the units in the joint account without the involvement of the other joint owners, in the manner specified when the joint owners' account is opened by all joint owners or the joint owner who submitted the application to join the Fund, and who paid the value of the units acquired. When opening a joint account for joint owners, it is permitted to specify that upon the death of any of the joint owners, his/her units shall automatically devolve to the other surviving joint owners in the account, until the last one of them dies. In order for the units to devolve to the other surviving joint owners in accordance with the previous indent, no income tax or other duties must be owed. When units are redeemed at the request of a joint owner who is permitted to use the units without the involvement of the others, the Company and Custodian shall be fully released from the obligation to pay any amount to the other joint owners for the units which were redeemed.

2.3.4 The initial unit price is set upon inception of the Fund.

The Fund was set up on 08/06/2018 with initial assets of € 125,000, which was the minimum level of assets required at the time of establishment and which will amount to € 500,000 within 12 months of establishment of the Fund by raising capital from investors, and with a unit price of € 5.

2.4 TRANSACTION PROCESS

Fund transactions are entered into after an application is submitted to either the Company or persons in the sales network for the Fund's units. To join the fund it is also essential to fully pay the amount being invested into the fund account which is held by the Custodian (Eurobank Cyprus Ltd).

Applications to join the Fund or redeem units must be submitted in ***hard copy*** via the Company's certified employees or persons in the sales network for the Fund's units.

2.4.1 Joining the Fund

A. In order for units in the Fund to be sold and acquired by the unitholder the following are needed

- a) An application form submitted in writing to the Company or the persons in the sales network for the Fund's units.

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- b) Acceptance of the Fund Regulations.
- c) Payment in full of the amount required to acquire units as specified based on the sale price, payable in cash.

Before submitting an application to acquire units in the Fund, the applicant/potential unitholder shall be provided with the following free of charge by the Company or the persons in the sales network for the Fund's units:

- a) the Fund's Information Memorandum;
- b) the Fund's Regulations;
- c) the Key Investor Information Document (KIID) for the Fund;
- d) information about the latest net value of the Fund's assets and the current (market) price of units; and
- e) the latest annual and half-yearly report for the Fund.

B. When submitting the application form the investor must pay the entire amount which is the acquisition price for units in the Fund into the bank account held at the credit institution shown in the application form. Deposits to join the Fund can only be made in Euro. If the details of the application form and the amount deposited do not match (wrong amount), the particulars of the deposit prevail.

The sale price of units shall be calculated based on the net price for units on the date the application is processed, namely the day immediately after the one on which the application for valuation is submitted, provided the application has been submitted within the cut-off times stated in the application form, and the price required to acquire the Fund units plus the relevant sale commission have been paid within those times.

C. Payment of the price to acquire units shall only be valid where the price is credited to the Fund account held at the Fund's Custodian (the credit institution by the name of Eurobank Cyprus Ltd whose registered offices are in the Republic at 41 Archbishop Makarios Ave., 1065 Nicosia and is supervised by the Central Bank of Cyprus).

Payment of the price for units in the Fund to a credit institution different from the one indicated in the application form is prohibited.

D. The Company will decide on whether or not to accept Fund membership applications in accordance with the terms set out in the Fund Regulations, which are attached hereto and form an integral part hereof.

2.4.2 Publication of Fund unit prices - Sale price

The net value of the Fund's assets, the number of units, the unit net price, the sale price and redemption price are calculated on each valuation date and shall be posted to the Company's website (www.3kip.gr) and the [websites](#) of persons involved in the Fund units sales network.

Valuation date means last working day working day of each calendar fortnight.

The sale price of units shall be calculated based on the net price for units on the date the application is processed, namely the day immediately after the one on which the application for valuation* is submitted, provided the application has been submitted within the cut-off times stated in the application form, and the price required to acquired the Fund units and the relevant sale commission has been paid.

* Valuation is done on each valuation date, namely the last working day working day of each calendar fortnight.

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2.5 Redemption of Units

Units will only be redeemed at the request of a unitholder. Where the unitholder wishes to redeem part of the units it holds, the application must cite the exact number of units the unitholder wishes to redeem. A conditional application to redeem units is not permitted and any such applications submitted are null and void.

2.5.1 Redemption procedure

To redeem units in the Fund the unitholder must submit a redemption application form to the Company or persons in the Fund units sale network in **hard copy** in a manner which ensures that his identity can be authenticated.

The redemption application form must be filled out with the full particulars of the unitholder/any joint unitholder and must state the precise number of units to be redeemed and the full name of the mutual fund concerned. If the information in the redemption form is wrong or incomplete to such an extent that it is not possible to implement the instructions it contains, the request will be cancelled and will be deemed never to have been received.

The value of units in the Fund which are redeemed shall be paid in cash no later than 30 calendar days from the date on which the redemption application is submitted.

2.5.2 Redemption price

Units in the Fund are redeemed at the Unit Redemption Price based on the valuation on the day after submission of the redemption application, provided the redemption application has been submitted within the cut-off times specified in the redemption application, less any redemption commission.

* Valuation is done on each valuation date, namely the last working day working day of each calendar fortnight.

2.5.3 Suspension of redemption

The redemption of units in the Fund can be suspended in exceptional cases, where it is required under the circumstances or in the interests of unitholders, at the request of the Company and where permission is granted by CYSEC, or in the interests of unitholders in accordance with the specific provisions of Article 43 of the Law.

In addition, on its own initiative CYSEC may: (i) decide for such time as it considers it to be in the interests of Fund unitholders or to safeguard problem-free market operations, suspend redemption of units in the Fund when the provisions of the relevant legislation or these Regulations or any other agreements governing its operation are not being complied with, (ii) extend the period for which it was decided to suspend redemption or payment, in accordance with the foregoing indent, for such time as it considers is required in the interests of investors or to safeguard problem-free market operations, (iii) withdraw the suspension of redemption or payment where it ascertained that before the suspension period, or any extension thereto, has expired, the conditions which were the basis for the decision to suspend ceased to exist.

No application for redemption may be submitted by unitholders during such time as the redemption of units is suspended.

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2.6 Market Timing – Late Trading

The Company and Broker do not accept applications to join the Fund which are associated with market timing or late trading activities, since such techniques are contrary to the interests of unitholders.

Late trading entails submitting and accepting an application to join a collective investment organisation or to redeem its shares or units after the point in time when the assets in its portfolio have been valued for the purpose of computing its net asset value (NAV) and consequently the value of its units or shares, for a specific date. By doing so, the investor can exploit knowledge of events for personal gain, or for the benefit of third parties on whose behalf they are acting.

Market timing indicates arbitraging is at play, whereby the investor submits an application to purchase or redeem units or shares in the same collective investment organisation on a continuous basis, within a short time period, exploiting differences in time zones and weaknesses or inefficiencies in computing the NAV.

The difference between these two practices (late trading and market timing) lies in the fact that in the latter, the practice is coordinated in the sense that the practice relates to various transactions which when taken overall generate a benefit. In the former, there is a single transaction, which on its own generates a benefit for the person entering into the transaction or for another person on whose behalf the transaction has been entered into.

The Company and persons in the sales network for Fund units have developed and put in place procedures to prevent late trading and market timing phenomena. At the same time the persons in the sales network for Fund units have adopted and implement suitable procedures and techniques to identify such cases and do not receive or transmit transactions to the Company where there are signs that it falls into any of the above categories, and where such a case exists they promptly notifies the Company in writing.

The asset and unit net price valuation is calculated on the 1st working day of each calendar fortnight (valuation day T) and valuation is done the next day (valuation T+1) using the closing prices from the previous working day (valuation day T). In order for the application to sell or redeem units in the Fund to be executed at the unit net price on the valuation date the application must have been submitted and accepted by 14:30 hours on the valuation date (reference day T).

Where units in the Fund are sold by keeping omnibus accounts, applications to acquire/redeem units receive by a person in the sales network for Fund units must be sent the same day to the Company in the form of a consolidated electronic file, in the form of an order per type of order (join or redeem, as appropriate),

3 Fund asset valuation rules and historical yield

3.1 The Fund's net assets and the unit's net value

3.1.1 General

The net value of the Fund's assets, the number of units, the unit net price, the sale price and redemption price are calculated on the last working day of each calendar fortnight and are posted to the Company's website (www.3kip.gr) and the websites of persons involved in the online sale of the Fund units.

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To compute the value of the Fund's net assets one must deduct (i) the fees and commission of the Company, the Custodian and members of regulated markets, the cost of publications mandated by the laws applicable to Mutual Funds, and other expenses specified in Article 6 of the Fund Regulations, as well as (ii) profits which may be distributed to unitholders valued on 31 December each year.

In order to calculate the net price of each unit in the Fund, the total value of its net assets shall be divided by the total number of units. The sale price and redemption price for Fund units may exceed or be less than the unit net price respectively by a figure corresponding to the sales or redemption commission.

Asset valuation rules

The Fund's assets are valued at fair value based on the valuation rules set out in Articles 67 to 74 of Regulation (EU) No 231/2013 and the rules applicable under the laws of the Republic.

Accounting period start and end dates

The Fund's financial year is one calendar year long, except the Fund's first financial year which ends on 31 December 2018, which is the year in which the Fund started.

Rules for preparing mutual fund income statements

1. Fund revenues from interest and dividends may be re-invested or distributed each year to unitholders having first deducted all expenses for the financial year specified in Article 6 of the Fund's Regulations.
2. The Company may re-invest or distribute profits from the sale of Fund assets to unitholders at its discretion, having deducted any capital losses incurred by the end of the year.
3. Where the Company decides to distribute profits they are to be distributed within 3 months from the end of each financial year, and a notice to that effect shall be posted on the Company's website on the internet before distribution commences. Profits shall be distributed to all persons who held units on the last day of the financial year in which profits were generated.
4. Unitholders may request that their profits be re-invested in the Fund. This is commission-free.
5. When profits are paid out, the corresponding taxes shall be withheld in accordance with the legislation which applies at the time the profits are paid out.

3.2 Historical yield

Given that the Fund was established in *June 2018*, there is no historical yield data.

4 Commission – Expenses – Fees

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The Company's Board of Directors acting within the limits set out in the Fund Regulations clearly lays down the commission policy for the commission payable by unitholders by setting qualitative and/or quantitative criteria for categorising unitholders (e.g. retail investors, institutional investors, bodies governed by public or private law, insurance funds, trading or other companies, the level of capital invested in the mutual fund, business relationship between the specific investor and the Company, etc.). The Company is obliged to be able to adequately justify the use of these criteria and show that they are being objectively applied.

4.1 Commission payable by Fund unitholders

Unitholders in the Fund shall be obliged to directly pay sale and redemption commission for its units which shall be up to 3% for sale and up to 3% for the redemption of units, which shall be calculated based on the value of the units being acquired or redeemed, and shall be collected by the Company at the time the relevant transaction is entered into.

The sales and redemption commission rates mentioned above are the maximum charges applicable based on the Fund regulations.

APPLICABLE COMMISSION (on the date this document was prepared)

The actual applicable sales and redemption commission rates on the date this Information Memorandum was prepared are listed below.

Fund name	Redemption commission	Sales commission per transaction for amounts from			
		€ 0.01 to € 10,000	€ 10,000.01 to € 25,000	€ 25,000.01 to € 100,000	€ 100,000.01 and over
3K MUTUAL FUND ANAGENISIS (AIF)	0%	2.00%	1.50%	1.00%	0.50%

4.2 Commission and expenses payable from Fund assets

The Company is obliged to refrain from including charges on the assets of the Fund it manages other than those charges specified in the Fund's Regulations.

4.2.1 Company's fee

The Company receives the following fees

- (i) **Management Fee*** up to 2% per annum and
- (ii) **Performance fee** The Company has decided not to charge a performance fee for the Fund's assets even though such a provision is contained in the Regulations.

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Note that the management fee and performance fee have already been deducted from the Fund's net price.

**This is the Company's commission for Fund management services provided by it (not commission for third parties to whom the Company has delegated part of the functions covered by Fund management).*

4.2.2 Custodianship fee

The custodianship fee is calculated each year as a percentage of the average daily valuations of the net value of the Fund's assets. It is collected at the end of each month.

The Custodianship Fee includes the commission for the Custodian and the fees for all other persons who have in their possession all or part of the Fund's assets for safekeeping.

The Custodianship fee is 0.10% per annum **maximum** subject to a minimum monthly charge

- € 300 (per month) for the first 12 months from the Fund's start date.
- € 450 (per month) from the 13th month after the Fund's start date and thereafter.

The custodianship fee has already been deducted from the net value of each Fund which is the basis for calculating the unit price used by unitholders when entering into transactions.

4.2.3 Other expenses and charges

Only those expenses which are listed below incurred on behalf of the mutual fund account by the Company and the Custodian can be imputed to the Fund.

- all payments to persons to whom the Custodian has delegated functions.
- the fee of statutory auditors for auditing the Fund.
- payments to legal and other advisors.
- any distribution expenses (for example printing and postage expenses).
- prior period expenses.
- expenses, taxes and commission for transactions entered into on the Fund's behalf.
- expenses for publications made on the Fund's behalf which are required by law.
- expenses relating to the provision of information to Fund unitholders required by the relevant legislation.
- any taxes relating to the Fund imposed by the applicable legislation, levies payable to CYSEC and related charges.

5 Taxation

Under Article 143 of the Law, the Fund and persons who acquire units in the Fund in the Republic of Cyprus are subject to the provisions of the Income Tax Laws and the Special Levy for Defence of the Republic Laws. Establishment of the Fund, and sale, redemption and transfer of units in the Fund are exempt from stamp duty in Cyprus as specified in the Republic of Cyprus' Stamp Duty Laws.

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The tax treatment of revenues generated for unitholders by the Fund varies depending on the unitholder's place of tax residence and the specific conditions which apply for each unitholder.

Persons who acquire units in the Fund in Greece and who are tax resident in Greece are subject to the Income Tax Laws and the Special Levy for Defence of the Republic Laws and the provisions of the applicable Convention on the Avoidance of Double Taxation between Greece and Cyprus.

Unitholders in the Fund may have their tax residence in a state other than Greece or Cyprus, to which the law of the state in which they are tax resident applies, and any relevant Convention on the Avoidance of Double Taxation may also be applicable.

We recommend that unitholders consult independent advisors about any tax consequences of joining a Fund based on the laws of the state in which they are tax resident.

6 Other information

1. Modifying the Fund's investment strategy and policy requires a change in the Fund's Regulations by the Company. To be valid it must be countersigned by the Custodian and approved by the Cyprus Securities and Exchange Commission. A notice about amendments to the Regulations must be promptly posted on the Company's website (www.3kip.gr) and that of the persons involved in the online sale of the Fund's units, and amendments to the Regulations must be promptly communicated to each unitholder in the Fund using a durable medium. Where the Fund's investment strategy and policy is modified, the Fund Information Memorandum shall be promptly updated as shall documents in general affected by the relevant change.

2. Method and time of publication of information relating to a) any new arrangements for how Fund liquidity is managed and b) the Fund's current risk appetite and risk management systems used to manage the said risks. Such information is included in this Fund Information Memorandum which must be posted to the Company's website www.3kip.gr, and the websites of persons involved in the sale of the Fund's units every time it is updated, and is available free of charge at all locations which sell units in the Fund, namely at the Company's offices (registered offices: 25-29 Karneadou St., Athens GR-10675) and the offices of persons involved in selling the Fund's Units.

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