

Annual Report 2023

Investment Company under Luxembourg Law (SICAV)

R.C.S. Luxembourg N° B 181 979

Annual report and audited financial statements as of 31 December 2023

SULA UCITS SICAV – FLEXIBLE ALPHA FUND

Annual report and audited financial statements as of 31 December 2023

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Sales restrictions

Shares of this Fund may not be offered, sold or distributed within the United States of America.

Management and Administration

Registered office of the Fund

33A, avenue John F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Board of Directors

Raquel Gómez-Pintado (Chairman)
Managing Director
Cladan Family Office
C/ Prado del Rey, 4
E-28223 Pozuelo de Alarcón
Spain

Giorgio Savona
Managing Director
Cladan Family Office
C/ Prado del Rey, 4
E-28223 Pozuelo de Alarcón
Spain

José Femenia Arguedas
Managing Director
C & D Investments S.à r.l.
14, rue Beck
L-1222 Luxembourg
Grand Duchy of Luxembourg

Irène Zander
Independent Director
6, rue Henri VII
L-1725 Luxembourg
Grand Duchy of Luxembourg

Management Company

Waystone Management Company (Lux) S.A.
19, Rue de Bitbourg
L-1273 Luxembourg
Grand Duchy of Luxembourg

Depository, Paying Agent and Domiciliary Agent

UBS Europe SE, Luxembourg Branch
33A, avenue John F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Administrator

Northern Trust Global Services SE
10, rue du Château d'Eau
L-3364 Leudelange
Grand Duchy of Luxembourg

Investment Manager

C & D Investments S.à r.l.
14, rue Beck
L-1222 Luxembourg
Grand Duchy of Luxembourg

Auditor

Ernst & Young Société Anonyme
35E, avenue John F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Legal adviser as to matters of Luxembourg law

Arendt & Medernach SA
41A, avenue John F. Kennedy
L-2082 Luxembourg
Grand Duchy of Luxembourg

Features of the Fund

SULA UCITS SICAV (hereafter called “the Fund”) is a public limited company (société anonyme) incorporated under the laws of the Grand Duchy of Luxembourg as an investment company with variable share capital (société d’investissement à capital variable). The Fund is subject to Part I of the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as amended or supplemented from time to time.

The Fund is a single legal entity incorporated as an umbrella fund comprised of separate subfunds. Shares in the Fund are shares in a specific subfund. The Fund may issue shares of different share classes in each subfund. Such share classes may each have specific characteristics. Certain share classes may be reserved to certain categories of investors. Investors should refer to the relevant Supplement of the Prospectus for further information on characteristics of share classes.

The Fund has been incorporated in Luxembourg initially on 18 November 2013 as a financial holding company (*société de participations financières*) under the form of a private limited company (*société à responsabilité limitée*) and has been converted into an investment company with variable share capital (*société d’investissement à capital variable*) on 14 December 2018. The Fund is registered with the Luxembourg Trade and Companies Register under number B 181 979. The latest version of the Articles of Association will be published in the *Recueil électronique des sociétés et associations* (“RESA”), the central electronic platform of the Grand-Duchy of Luxembourg.

The Fund has appointed Waystone Management Company (Lux) S.A. as its management company in accordance with the provisions of the 2010 Law pursuant to the Management Company Agreement.

The Management Company is a public limited company (société anonyme) registered under number B 96 744 in the Luxembourg commercial and companies’ register, where copies of its articles of association are available for inspection and can be received upon request. Its registered office is in 19, rue de Bitbourg, L-1273 Luxembourg.

The articles of association were published in the Mémorial in Luxembourg on 26 November 2003 and the latest update has been published on 14 April 2014. The Management Company is authorised and regulated by the CSSF in Luxembourg under Luxembourg

law. Its main business activity is the management of Luxembourg and foreign undertakings for collective investment in transferable securities authorised according to Directive 2009/65/EC and the additional management of other Luxembourg and foreign undertakings for collective investment, in accordance with Article 101 (2) and Annex II of the 2010 Law and the performance, for Luxembourg and foreign alternative investment funds (AIFs) within the meaning of Directive 2011/61/EU of management functions, administration functions, marketing functions and other activities related to the assets of AIFs, in accordance with Article 5 (2) and Annex I of the Luxembourg Law of 12 July 2013 relating to alternative investment fund managers.

The fully paid-up capital of the Management Company amounts to EUR 2 450 000 as of 22 June 2017.

The financial year of the Fund will begin on 1 January of each year and end on 31 December of the same year.

Currently, the Fund offers Class U Shares, Class H Shares and Class R Shares which are open to retail and institutional investors. There are no Share Classes distributing dividends.

The annual general meeting of shareholders will be held within six (6) months of the end of each financial year in Luxembourg in order to approve the financial statements of the Fund for the previous financial year. The annual general meeting of shareholders will be held at the registered office of the Fund, or at such alternative location in Luxembourg as may be specified in the convening notice of such meeting.

Only the information contained in the sales prospectus and in one of the documents referred to therein shall be deemed to be valid.

The detailed schedule of portfolio movements, the annual and semi-annual reports are available free of charge to shareholders at the registered office of the Fund and the Depositary.

No subscription may be accepted on the basis of the financial reports. Subscriptions are accepted only on the basis of the current prospectus accompanied by the latest annual report and the latest semi-annual report if available.

The figures stated in this report are historical and not necessarily indicative of future performance.

Investment Manager's Report

The U.S. fixed income market in 2023 was characterized by high volatility, driven mainly by continuous interest rate hikes by the Federal Reserve and instability in the banking sector, which required government intervention. These factors led to an increase in bond market volatility, as measured by the MOVE Index. Despite the volatility and challenging initial conditions of the year, long-term interest rates for U.S. Treasury securities with maturities of two years or more remained relatively unchanged by mid-year.

The Federal Open Market Committee (FOMC) kept the federal funds rate in a range of 5.25% to 5.50% in November 2023, in line with market expectations. The committee's economic assessment showed slight changes in wording, reflecting stronger economic data in the third quarter and a moderation in job growth. Despite some positive signs, the FOMC highlighted tighter financial conditions that could impact the economy and inflation.

The U.S. stock market experienced notably positive performance. The S&P 500 index closed the year with a 24.2% gain, while the Dow Jones Industrial Average recorded an increase of over 13%. Impressively, the Nasdaq stood out with a 43% rise, primarily driven by gains in large tech companies such as Nvidia, Amazon, and Microsoft.

Throughout the year, the S&P 500 showed significant fluctuations influenced by various economic, political, and market events. For instance, the index started the year at 3892 and experienced several ups and downs before closing in December at a significantly higher level. This evolution reflects the market's response to a series of factors, including Federal Reserve policies, the geopolitical environment, and developments in the tech and banking sector.

In 2023, European financial markets experienced several significant developments, reflecting a challenging but also adaptive and changing year. A central theme was combating high inflation, which remained high throughout the year, although it showed signs of gradual decline. Initially, Eurozone inflation was in double digits at the end of 2022 but started to decrease in 2023, reaching 6.9% in March.

Financial stability was a key focus in 2023, with the European Central Bank (ECB) raising key interest

rates by 50 basis points in March as part of the monetary policy normalization process. These measures aimed to ensure the timely return of inflation to the medium-term target of 2%. Additionally, the ECB's asset purchase program began to decrease at a pace of 15 billion euros per month until the end of June 2023.

The European leveraged loan market saw an increase in issuance in 2023, mainly driven by refinancing activities and loan extensions. However, corporate profitability remained solid in the Eurozone, despite higher interest rates impacting the debt servicing capacity of more vulnerable firms. The real estate market situation was particularly challenging, with a marked decline in property prices due to tighter financing conditions and structurally lower demand post-pandemic.

Households in the Eurozone experienced a decrease in the debt-to-income ratio, moving from 94.3% in the third quarter of 2022 to 88.1% in the same period of 2023. This improvement in households' financial health was supported by robust labor markets, though there were signs of weakening towards the end of the year.

Regarding government stability, sovereign bond markets remained contained, with many governments securing cheap long-term financing during the period of low-interest rates. However, higher funding costs and less prudent fiscal policies could reignite concerns about sovereign debt sustainability, particularly in countries with already high debt levels.

In summary, European financial markets in 2023 reflected a mix of challenges and resilience, with ongoing efforts to manage inflation, changes in monetary and fiscal policies, and consistent attention to financial stability in a context of global and regional uncertainty.

In this context of markets, with rising interest rates, high volatility, a banking crisis in the US during March 2023, and the bailout of Credit Suisse by the Swiss government, the fund's management was focused on two strategies. The first was the construction of a fixed income portfolio that would allow us to take advantage of the advantageous yields achieved by credit and public debt markets.

With a median duration below 1 and a yield to maturity close to 4%, this fixed-income portfolio allowed the fund to maintain a positive evolution of the NAV from June on a monthly basis, while the portfolio's volatility was around 1%. We expect that during 2024, the performance of the fixed-income portfolio will follow a similar trajectory to the second half of 2023.

As a second strategy, an active investment policy was developed for trading in equity index assets, fixed income, and currencies. This trading activity aims to improve the overall return of the portfolio, systematically consolidating gains while maintaining the fund's volatility at controlled levels.

The performance during 2023 was satisfactory, achieving positive results, having executed more than 100 trades in different indices throughout the year. We expect to continue intensively with the trading strategy in 2024.

Although the overall annual return of the fund was modest, we believe we have laid the foundations for improved performance in 2024, with a focus on safety and controlling the fund's volatility, which allows us to feel confident in its future evolution, despite the significant economic and geopolitical uncertainty surrounding us.

Independent Auditor's Report

To the Shareholders of

SULA UCITS SICAV

33A, avenue John F. Kennedy
L-1855 Luxembourg

Opinion

We have audited the financial statements of SULA UCITS SICAV (the "Fund") which comprise the statement of net assets and the schedule of investments and other net assets as at 31 December 2023, and the statement of operations and the statement of changes in net assets for the year then ended, and the notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Fund as at 31 December 2023, and of the results of its operations and changes in its net assets for the year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements.

Basis for Opinion

We conducted our audit in accordance with the Law of 23 July 2016 on the audit profession (the "Law of 23 July 2016") and with International Standards on Auditing ("ISAs") as adopted for Luxembourg by the "Commission de Surveillance du Secteur Financier" ("CSSF"). Our responsibilities under the Law of 23 July 2016 and ISAs as adopted for Luxembourg by the CSSF are further described in the "responsibilities of the "réviseur d'entreprises agréé" for the audit of the financial statements" section of our report. We are also independent of the Fund in accordance with the International Code of Ethics for Professional Accountants, including International Independence Standards, issued by the International Ethics Standards Board for Accountants ("IESBA Code") as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the financial statements, and have fulfilled our other ethical responsibilities under those ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other information

The Board of Directors of the Fund is responsible for the other information. The other information comprises the information included in the annual report but does not include the financial statements and our report of the "réviseur d'entreprises agréé" thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

Responsibilities of the Board of Directors of the Fund for the financial statements

The Board of Directors of the Fund is responsible for the preparation and fair presentation of these financial statements in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements, and for such internal control as the Board of Directors of the Fund determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Board of Directors of the Fund is responsible for assessing the Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors of the Fund either intends to liquidate the Fund or to cease operations, or has no realistic alternative but to do so.

Responsibilities of the “réviseur d’entreprises agréé” for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a report of the “réviseur d’entreprises agréé” that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund’s internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors of the Fund.
- Conclude on the appropriateness of Board of Directors of the Fund use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund’s ability to continue as a going concern. If we conclude that a material

uncertainty exists, we are required to draw attention in our report of the “réviseur d’entreprises agréé” to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our report of the “réviseur d’entreprises agréé”. However, future events or conditions may cause the Fund to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Luxembourg, 26 April 2024

ERNST & YOUNG
Société Anonyme
Cabinet de révision agréé



Nadia Faber

SULA UCITS SICAV – FLEXIBLE ALPHA FUND

Three-year comparison

Date	ISIN	31.12.2023	31.12.2022	31.12.2021
Net assets in EUR		91 262 200.80	90 420 897.50	77 265 186.58
Class H Shares	LU1900183697			
Shares outstanding		85 301.5700	81 196.4800	101 101.1620
Net asset value per share in EUR ¹		97.96	97.58	103.15
Class R Shares	LU1900183424			
Shares outstanding		6 033.3590	8 674.5690	8 674.5690
Net asset value per share in EUR ¹		96.26	96.22	102.07
Class U Shares	LU1900183770			
Shares outstanding		737 651.7090	737 119.5490	565 093.0480
Net asset value per share in EUR ¹		111.60	110.79	116.71

¹ See note 1

Structure of the Securities Portfolio

Geographical Breakdown as a % of net assets	
United States	26.72
Germany	25.26
The Netherlands	20.09
France	7.01
Supranationals	3.83
Norway	3.27
Luxembourg	2.26
Italy	2.19
Austria	2.16
United Kingdom	1.09
Japan	1.08
Jersey	1.07
Denmark	1.05
Total	97.08

Economic Breakdown as a % of net assets	
Countries & central governments	34.21
Finance & holding companies	17.12
Banks & credit institutions	12.39
Computer hardware & network equipment providers	4.34
Supranational organisations	3.83
Miscellaneous services	3.76
Telecommunications	3.05
Vehicles	2.78
Aerospace industry	2.73
Petroleum	2.73
Pharmaceuticals, cosmetics & medical products	2.68
Internet, software & IT services	2.25
Miscellaneous consumer goods	2.15
Lodging, catering & leisure	1.42
Tobacco & alcohol	1.09
Energy & water supply	0.55
Total	97.08

Statement of Net Assets

	EUR
Assets	31.12.2023
Investments in securities, cost	88 358 406.51
Investments in securities, unrealized appreciation (depreciation)	234 504.38
Total investments in securities (Note 1)	88 592 910.89
Cash at banks, deposits on demand and deposit accounts	2 164 833.16
Interest receivable on securities	731 466.07
Other receivables	55 750.25
Formation expenses, net (Note 1)	7 029.30
Total Assets	91 551 989.67
Liabilities	
Provisions for administration fees (Note 2)	-15 645.94
Provisions for investment manager fees (Note 2)	-53 350.06
Provisions for management company fees (Note 2)	-97 827.93
Provisions for depositary fees (Note 2)	-5 830.03
Provisions for taxe d'abonnement (Note 3)	-11 159.79
Provisions for regulatory fees (Note 2)	-30 624.46
Provisions for audit fees, legal and economic advice (Note 2)	-11 749.75
Provisions for other commissions and fees (Note 2)	-63 600.91
Total provisions	-289 788.87
Total Liabilities	-289 788.87
Net assets at the end of the financial year	91 262 200.80

Statement of Operations

	EUR
Income	1.1.2023-31.12.2023
Interest on liquid assets	82 708.48
Interest on securities	1 325 716.00
Dividends	1 471.96
Total income	1 409 896.44
Expenses	
Administration fees (Note 2)	-72 604.91
Investment manager fees (Note 2)	-661 807.38
Management company fees (Note 2)	-67 344.80
Depository fees (Note 2)	-72 092.46
Distribution fees (Note 2)	-65 601.51
Taxe d'abonnement (Note 3)	-38 934.79
Regulatory fees (Note 2)	-16 343.31
Audit fees, legal and economic advice (Note 2)	-28 388.51
Amortization of formation expenses (Note 1)	-8 797.19
Other commissions and fees (Note 2)	-238 298.03
Interest on cash and bank overdraft	-8 541.59
Total expenses	-1 278 754.48
Net income (loss) on investments	131 141.96
Realized gain (loss) (Note 1)	
Realized gain (loss) on market-priced securities without options	188 047.51
Realized gain (loss) on options	-841 225.39
Realized gain (loss) on yield-evaluated securities and money market instruments	-76 839.33
Realized gain (loss) on financial futures	457 888.09
Realized gain (loss) on forward foreign exchange contracts	904 814.26
Realized gain (loss) on foreign exchange	-83 198.79
Total realized gain (loss)	549 486.35
Net realized gain (loss) of the financial year	680 628.31
Changes in unrealized appreciation (depreciation) (Note 1)	
Unrealized appreciation (depreciation) on market-priced securities without options	810 094.38
Unrealized appreciation (depreciation) on options	-119 117.59
Unrealized appreciation (depreciation) on yield-evaluated securities and money market instruments	307 937.17
Unrealized appreciation (depreciation) on financial futures	34 645.64
Unrealized appreciation (depreciation) on forward foreign exchange contracts	-1 081 594.29
Total changes in unrealized appreciation (depreciation)	-48 034.69
Net increase (decrease) in net assets as a result of operations	632 593.62

Statement of Changes in Net Assets

	EUR
	1.1.2023-31.12.2023
Net assets at the beginning of the financial year	90 420 897.50
Subscriptions	460 070.25
Redemptions	-251 360.57
Total net subscriptions (redemptions)	208 709.68
Net income (loss) on investments	131 141.96
Total realized gain (loss)	549 486.35
Total changes in unrealized appreciation (depreciation)	-48 034.69
Net increase (decrease) in net assets as a result of operations	632 593.62
Net assets at the end of the financial year	91 262 200.80

Changes in the Number of Shares outstanding

	1.1.2023-31.12.2023
Class	H Shares
Number of shares outstanding at the beginning of the financial year	81 196.4800
Number of shares issued	4 105.0900
Number of shares redeemed	0.0000
Number of shares outstanding at the end of the financial year	85 301.5700
Class	R Shares
Number of shares outstanding at the beginning of the financial year	8 674.5690
Number of shares issued	0.0000
Number of shares redeemed	-2 641.2100
Number of shares outstanding at the end of the financial year	6 033.3590
Class	U Shares
Number of shares outstanding at the beginning of the financial year	737 119.5490
Number of shares issued	541.3200
Number of shares redeemed	-9.1600
Number of shares outstanding at the end of the financial year	737 651.7090

Statement of Investments in Securities and other Net Assets as of 31 December 2023

Description	Quantity/ Nominal	Valuation in EUR Unrealized gain (loss) on Futures/ Forward Exchange Contracts (Note 1)	as a % of net assets
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Transferable securities and money market instruments listed on an official stock exchange

Treasury bills, zero coupon

EUR				
EUR	GERMANY, REPUBLIC OF TB-REG-S 0.00000% 22.02.23-21.02.24	3 700 000.00	3 680 871.00	4.03
EUR	GERMANY, REPUBLIC OF TB-REG-S 0.00000% 20.03.23-20.03.24	2 500 000.00	2 480 112.50	2.72
EUR	GERMANY, REPUBLIC OF TB-REG-S 0.00000% 17.05.23-15.05.24	3 000 000.00	2 959 650.00	3.24
EUR	GERMANY, REPUBLIC OF-REG-S TB 0.00000% 23.08.23-21.08.24	3 200 000.00	3 130 890.82	3.43
EUR	NETHERLANDS TB 0.00000% 06.09.23-28.02.24	7 000 000.00	6 960 168.74	7.63
Total EUR			19 211 693.06	21.05

Total Treasury bills, zero coupon

19 211 693.06 **21.05**

Notes, fixed rate

EUR				
EUR	AMERICAN HONDA FINANCE CORP-REG-S 1.95000% 20-18.10.24	500 000.00	492 469.00	0.54
EUR	BERKSHIRE HATHAWAY INC 1.30000% 16-15.03.24	500 000.00	497 100.00	0.55
EUR	BP CAPITAL MARKETS PLC-REG-S 1.87600% 20-07.04.24	1 000 000.00	994 108.00	1.09
EUR	HARLEY-DAVIDSON FIN.SERV INC-REG-S 0.90000% 19-19.11.24	500 000.00	485 888.40	0.53
EUR	L'OREAL SA-REG-S 0.87500% 22-29.06.26	1 000 000.00	953 410.00	1.04
EUR	LVMH MOET HENNESSY LOUIS VUIT SE-REG-S 3.37500% 23-21.10.25	1 000 000.00	1 006 200.00	1.10
EUR	MITSUBISHI UF FINANCIAL GROUP INC-REG-S 0.33900% 19-19.07.24	500 000.00	489 961.70	0.54
EUR	PHILIP MORRIS INTERNATIONAL INC 2.87500% 12-30.05.24	1 000 000.00	994 966.00	1.09
EUR	VISA INC 1.50000% 22-15.06.26	500 000.00	482 965.00	0.53
Total EUR			6 397 068.10	7.01

Total Notes, fixed rate

6 397 068.10 **7.01**

Notes, zero coupon

EUR				
EUR	HONEYWELL INTERNATIONAL INC 0.00000% 20-10.03.24	500 000.00	496 211.00	0.55
Total EUR			496 211.00	0.55

Total Notes, zero coupon

496 211.00 **0.55**

Medium term notes, fixed rate

EUR				
EUR	BANK OF AMERICA CORP-REG-S 2.37500% 14-19.06.24	500 000.00	496 135.00	0.54
EUR	BMW FINANCE NV-REG-S 1.00000% 18-14.11.24	1 000 000.00	976 920.00	1.07
EUR	BMW FINANCE NV-REG-S 0.50000% 22-22.02.25	500 000.00	483 162.00	0.53
EUR	CITIGROUP INC-REG-S 2.37500% 14-22.05.24	1 500 000.00	1 490 490.00	1.63
EUR	DAIMLER AG-REG-S 1.40000% 16-12.01.24	1 000 000.00	999 168.00	1.10
EUR	DANSKE BANK AS-REG-S 0.62500% 20-26.05.25	1 000 000.00	961 083.84	1.05
EUR	DEUTSCHE BAHN FINANCE GMBH-REG-S 3.50000% 23-20.09.27	1 100 000.00	1 130 833.00	1.24
EUR	DEUTSCHE TELEKOM INTL FINANCE-REG-S 0.87500% 17-30.01.24	500 000.00	498 787.00	0.55
EUR	EADS FINANCE BV-REG-S 2.37500% 14-02.04.24	2 000 000.00	1 991 384.00	2.18
EUR	ELECTRICITE DE FRANCE-REG-S 4.62500% 09-11.09.24	500 000.00	502 378.00	0.55
EUR	EQUINOR ASA-REG-S 2.87500% 13-10.09.25	2 500 000.00	2 486 110.70	2.72
EUR	EUROPEAN INVESTMENT BANK 2.12500% 14-15.01.24	3 500 000.00	3 497 893.00	3.83
EUR	GLENCORE FINANCE EUROPE SA-REG-S 0.62500% 19-11.09.24	1 000 000.00	976 198.00	1.07
EUR	GOLDMAN SACHS GROUP INC/THE-REG-S 1.37500% 17-15.05.24	1 400 000.00	1 386 408.80	1.52
EUR	INTESA SANPAOLO SPA-REG-S 1.37500% 17-18.01.24	2 000 000.00	1 997 580.00	2.19
EUR	JPMORGAN CHASE & CO-REG-S 0.62500% 16-25.01.24	4 500 000.00	4 490 496.00	4.92
EUR	L'OREAL SA-REG-S 2.87500% 23-19.05.28	1 000 000.00	1 004 660.00	1.10
EUR	LVMH MOET HENNESSY LOUIS VUITTO-REG-S 0.75000% 20-07.04.25	2 000 000.00	1 938 644.00	2.12
EUR	MCDONALD'S CORP-REG-S 2.37500% 12-27.11.24	300 000.00	296 277.60	0.33
EUR	MCDONALD'S CORP-REG-S 0.62500% 17-29.01.24	1 000 000.00	997 468.00	1.09
EUR	MIZUHO FINANCIAL GROUP INC-REG-S 0.52300% 19-10.06.24	500 000.00	492 348.00	0.54
EUR	MORGAN STANLEY 1.75000% 16-11.03.24	500 000.00	497 797.00	0.55
EUR	NESTLE FINANCE INTERNATIONAL LTD-REG-S 3.50000% 23-13.12.27	2 000 000.00	2 064 244.00	2.26
EUR	PORSCHE AUTOMOBIL HOLDING SE-REG-S 4.12500% 23-27.09.27	1 000 000.00	1 038 700.00	1.14
EUR	ROCHE FINANCE EUROPE BV-REG-S 0.87500% 15-25.02.25	500 000.00	487 535.81	0.53
EUR	SHELL INTERNATIONAL FINANCE BV-REG-S 0.37500% 16-15.02.25	500 000.00	484 275.54	0.53
EUR	STELLANTIS NV-REG-S 2.00000% 17-23.03.24	500 000.00	497 543.00	0.55
EUR	TELENOR ASA-REG-S 2.62500% 12-06.12.24	500 000.00	494 745.00	0.54
EUR	TOTAL CAPITAL INTERNATIONAL SA-REG-S 2.87500% 13-19.11.25	1 000 000.00	994 622.00	1.09
EUR	VOLKSWAGEN LEASING GMBH-REG-S 1.12500% 17-04.04.24	2 000 000.00	1 985 056.00	2.18
Total EUR			37 638 943.29	41.24

Total Medium term notes, fixed rate

37 638 943.29 **41.24**

Description	Quantity/ Nominal	Valuation in EUR Unrealized gain (loss) on Futures/ Forward Exchange Contracts (Note 1)	as a % of net assets
Bonds, fixed rate			
EUR			
EUR APPLE INC 1.37500% 15-17.01.24	2 000 000.00	1 997 956.00	2.19
EUR APPLE INC 2.00000% 15-17.09.27	1 000 000.00	978 518.00	1.07
EUR AT&T INC 2.40000% 14-15.03.24	2 300 000.00	2 291 628.00	2.51
EUR COLGATE-PALMOLIVE CO 0.50000% 19-06.03.26	500 000.00	475 432.70	0.52
EUR GERMANY, REPUBLIC OF-REG-S 6.25000% 94-04.01.24	1 650 000.00	1 649 950.50	1.81
EUR INTERNATIONAL BUSINESS MACHINES CORP 1.12500% 16-06.09.24	1 000 000.00	981 996.00	1.08
EUR METROPOLITAN LIFE GLOBAL FUNDING-REG-S 0.37500% 19-09.04.24	1 000 000.00	990 330.00	1.09
EUR MICROSOFT CORP 3.12500% 13-06.12.28	2 000 000.00	2 055 372.20	2.25
EUR NETHERLANDS, KINGDOM OF THE 144A-REG-S 2.00000% 14-15.07.24	6 000 000.00	5 953 538.40	6.52
EUR PROCTER & GAMBLE CO 4.87500% 07-11.05.27	1 400 000.00	1 489 527.20	1.63
EUR VOLKSWAGEN LEASING GMBH-REG-S 2.62500% 14-15.01.24	1 500 000.00	1 499 274.00	1.64
Total EUR		20 363 523.00	22.31
Total Bonds, fixed rate		20 363 523.00	22.31
Total Transferable securities and money market instruments listed on an official stock exchange		84 107 438.45	92.16
Transferable securities and money market instruments traded on another regulated market			
Treasury bills, zero coupon			
EUR			
EUR AUSTRIA, REPUBLIC OF TB 0.00000% 28.09.23-25.04.24	2 000 000.00	1 975 535.84	2.17
EUR GERMANY, REPUBLIC OF-REG-S TB 0.00000% 22.11.23-20.11.24	2 500 000.00	2 429 590.48	2.66
Total EUR		4 405 126.32	4.83
Total Treasury bills, zero coupon		4 405 126.32	4.83
Total Transferable securities and money market instruments traded on another regulated market		4 405 126.32	4.83
Derivative instruments listed on an official stock exchange			
Options on indices, classic-styled			
EUR			
EUR DEUTSCHE BORSE AG PUT 16850.00000 16.02.24	44.00	64 504.00	0.07
Total EUR		64 504.00	0.07
Total Options on indices, classic-styled		64 504.00	0.07
Options on indices futures, classic-styled			
USD			
USD S&P500 EMINI OPTION PUT 4550.00000 15.03.24	20.00	33 042.14	0.04
USD S&P500 EMINI OPTION PUT 4350.00000 15.03.24	-20.00	-17 200.02	-0.02
Total USD		15 842.12	0.02
Total Options on indices futures, classic-styled		15 842.12	0.02
Total Derivative instruments listed on an official stock exchange		80 346.12	0.09
Total investments in securities		88 592 910.89	97.08
Cash at banks, deposits on demand and deposit accounts and other liquid assets		2 164 833.16	2.37
Other assets and liabilities		504 456.75	0.55
Total net assets		91 262 200.80	100.00

Notes to the Financial Statements

Note 1 – Summary of significant accounting policies

The financial statements have been prepared in accordance with the generally accepted accounting principles for investment funds in Luxembourg. The significant accounting policies are summarised as follows:

a) Calculation of the net asset value

The net asset value per share shall be determined by the Administrator as of each Valuation Day (as specified for each subfund in the relevant Supplement of the Prospectus) and at least twice a month. It is calculated by dividing the net asset value of the share class of a subfund by the total number of shares of such share class in issue as of that Valuation Day. The net asset value per share is expressed in the reference currency of the share class and may be rounded up or down to two (2) decimal places.

The net asset value of a share class is equal to the value of the assets allocated to such share class within a subfund less the value of the liabilities allocated to such share class, both being calculated as of each Valuation Day.

The net asset value of a subfund is equal to the value of the assets allocated to such subfund less the value of the liabilities allocated to such subfund, both calculated as of each Valuation Day in the reference currency of the subfund.

b) Valuation principles

- 1) The value of any cash on hand or on deposit, bills or notes payable, accounts receivable, prepaid expenses, cash dividends and interest accrued but not yet received shall be equal to the entire nominal or face amount thereof, unless the same is unlikely to be paid or received in full, in which case the value thereof shall be determined after making such discount as the Board of Directors may consider appropriate in such case to reflect the true value thereof.
- 2) Transferable Securities and Money Market Instruments which are quoted, listed or traded on an exchange or regulated market will be valued, unless otherwise provided under paragraphs 3) and 6) below, at the last available market price or quotation, prior to the time of valuation, on the exchange or regulated market where the securities or instruments are primarily quoted, listed or traded. Where securities or instruments are quoted, listed or traded on more than one exchange or regulated

market, the Board of Directors will determine on which exchange or regulated market the securities or instruments are primarily quoted, listed or traded and the market prices or quotations on such exchange or regulated market will be used for the purpose of their valuation. Transferable Securities and Money Market Instruments for which market prices or quotations are not available or representative, or which are not quoted, listed or traded on an exchange or regulated market, will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

- 3) Notwithstanding paragraph 2) above, where permitted under applicable laws and regulations, Money Market Instruments may be valued using an amortisation method whereby instruments are valued at their acquisition cost as adjusted for amortisation of premium or accrual of discount on a constant basis until maturity, regardless of the impact of fluctuating interest rates on the market value of the instruments. The amortisation method will only be used if it is not expected to result in a material discrepancy between the market value of the instruments and their value calculated according to the amortisation method.
- 4) Financial derivative instruments which are quoted, listed or traded on an exchange or regulated market will be valued at the last available settlement price or, if such settlement price is not available, at the last available bid price, prior to the time of valuation, on the exchange or regulated market where the instruments are primarily quoted, listed or traded. Where instruments are quoted, listed or traded on more than one exchange or regulated market, the Board of Directors will determine on which exchange or regulated market the instruments are primarily quoted, listed or traded and the closing or settlement prices or quotations on such exchange or regulated market will be used for the purpose of their valuation. Financial derivative instruments for which closing or settlement prices or quotations are not available or representative will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.
- 5) Financial derivative instruments which are traded "over-the-counter" (OTC) will be valued daily at their fair market value, on the basis of valuations provided by the counterparty which will be approved or verified on a regular basis independently from the counterparty. Alternatively, OTC financial derivative

instruments may be valued on the basis of independent pricing services or valuation models approved by the Board of Directors which follow international best practice and valuation principles. Any such valuation will be reconciled to the counterparty valuation on a regular basis independently from the counterparty, and significant differences will be promptly investigated and explained.

- 6) Notwithstanding paragraph 2) above, shares or units in target investment funds (including UCITS and UCI) will be valued at their latest available official net asset value, as reported or provided by or on behalf of the investment fund or at their latest available unofficial or estimated net asset value if more recent than the latest available official net asset value, provided that the Board of Directors is satisfied of the reliability of such unofficial net asset value. The Net Asset Value calculated on the basis of unofficial net asset values of the target investment fund may differ from the Net Asset Value which would have been calculated, on the same Valuation Day, on the basis of the official net asset value of the target investment fund. Alternatively, shares or units in target investment funds which are quoted, listed or traded on an exchange or regulated market may be valued in accordance with the provisions of paragraph 2) above.
- 7) The value of any other asset not specifically referenced above will be the probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

c) Net realized gain (loss) on sales of securities

The realized gains or losses on the sales of securities are calculated on the basis of the average cost of the securities sold.

d) Valuation of forward foreign exchange contracts

The unrealized gain (loss) of outstanding forward foreign exchange contracts is valued on the basis of the forward exchange rates prevailing at valuation date.

e) Valuation of financial futures contracts

Financial futures contracts are valued based on the latest available published price applicable on the valuation date. Realized gains and losses and the changes in unrealized gains and losses are recorded in the statement of operations. The realized gains and losses are calculated in accordance with the FIFO method, i.e. the first contracts acquired are regarded as the first to be sold.

f) Conversion of foreign currencies

Bank accounts, other net assets and the valuation of the investments in securities held denominated in currencies other than the reference currency of the different subfunds are converted at the mid closing spot rates on the valuation date. Income and expenses denominated in currencies other than the currency of the different subfunds are converted at the mid closing spot rates at payment date. Gain or loss on foreign exchange is included in the statement of operations.

The cost of securities denominated in currencies other than the reference currency of the different subfunds is converted at the mid closing spot rate prevailing on the day of acquisition.

g) Receivable on securities sales, Payable on securities purchases

The position "Receivable on securities sales" can also include receivables from foreign currency transactions. The position "Payable on securities purchases" can also include payables from foreign currency transactions.

Receivables and payables from foreign exchange transactions are netted.

h) Income recognition

Dividends, net of withholding taxes, are recognized as income on the date upon which the relevant securities are first listed as "ex-dividend". Interest income is accrued on a daily basis.

i) Formation expenses

The fees and expenses incurred in connection with the formation of the Fund are estimated to an amount of approximately 60 000 EUR. Such costs will be borne by the Fund and may be amortised over a period of up to five (5) years from the date of incorporation of the Fund. The formation expenses of each new subfund will be borne by such subfund and may be amortised over a period of up to five (5) years. New subfunds created after the incorporation and launch of the Fund will participate in the non-amortised formation expenses of the Fund.

Note 2 – Fees and Expenses

Management Company Fee

In consideration for the services provided by the Management Company, the Management Company is entitled to an annual Management Company Fee, calculated as the average of the month-end Net Asset Value of the previous quarter and invoiced quarterly in arrears. The Management Company Fee is payable quarterly out of the assets of each subfund at a rate as specified for each subfund and/or Class in the relevant Special Section. The Management Company Fee is subject to a maximum of 0.06% p.a. of the Net Asset Value and subject to a minimum annual fee of EUR 15 000 per subfund.

In addition to the Management Company Fee, the Management Company is entitled to an annual fee per subfund of up to EUR 10 000 for the provision of risk management and investment compliance monitoring services. The Management Company may receive other fees for providing additional services, as agreed with the Board of Directors.

In addition, where applicable, any value added tax ("VAT") associated with the above fees and reimbursements will be charged to the relevant subfund.

The Management Company will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties.

Investment Manager Fee

The Investment Manager will be entitled to an annual fee equal to a percentage of the average Net Asset Value of each subfund or Share Class consistent with market practice as set out in the Supplement of the Prospectus for each subfund or Share Class. The Investment Manager fee will accrue on each Valuation Day and will be payable monthly in arrears out of the assets of each subfund and Share Class at a rate as follows:

SULA UCITS SICAV – FLEXIBLE ALPHA FUND	
Share Class name	Investment Management Fee
Class H Shares	1.05% p.a.
Class R Shares	1.40% p.a.
Class U Shares	0.70% p.a.

The Investment Manager will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties.

The Investment Manager may from time to time, at its sole discretion, decide to waive or return to the Fund all or part of its annual fee. Subject to applicable laws and regulations, the Investment Manager may also from time to time, at its sole discretion, enter into private arrangements with certain investors or financial intermediaries, affiliates and/or third-parties, whereby the Investment Manager will agree to pay an amount representing all or part of its annual fee.

Performance Fee

The Investment Manager may be entitled to receive a Performance Fee with respect to certain subfunds or Share Classes. The payment and size of the Performance Fee depends on the performance of the subfund or Share Class over a specified reference period. The Performance Fee is calculated and accrued at each Valuation Day on the basis of the Net Asset Value per Share after deducting all fees and expenses, including the Investment Manager Fee (but not the Performance Fee) and adjusting for subscriptions and redemptions during the performance period so these will not affect the calculation of the Performance Fee. The Performance Fee is paid out of the assets of the Fund and allocated to the relevant subfunds and Share Classes as described in section 8.2 (Valuation procedure) in the sales prospectus. Details regarding the calculation and payment of Performance Fees are contained in the subfund's Supplement of the Prospectus.

Different Performance Fee calculation models may be used to calculate the Performance Fee. The models further described below may be used and/or combined by the Investment Manager as further provided in the relevant subfund's Supplement. The Performance Fee rate is disclosed in the relevant subfund's Supplement of the prospectus.

The reference period is represented by each calendar year being the fiscal year of the Fund (the "Reference Period"). and as such calendar year ends on 31 December (the "Crystallisation Date").

The amount accrued shall be paid annually to the Investment Manager within fifteen Business Days following the Crystallisation Date.

In case of (i) the liquidation of a subfund according to section 10.9.1, (ii) the merger of a subfund according to section 10.8.1, (iii) the reorganisation of a Share Class according to section 10.8.3 or (iv) the redemption of Shares by investors according to section 7.5, the Performance Fee, if any, shall crystallise in due proportions on the date of respectively the liquidation, the merger, the reorganisation or the redemption. However, in case of the merger of a subfund according to section 10.8.1 of the prospectus, no Performance Fee shall crystallise if the receiving subfund is newly established with no performance history and the merger does not substantially change the subfund's investment policy.

High on high model

According to the high on high model, the Performance Fee may only be charged if the Net Asset Value per Share of the relevant Share Class exceeds the Net Asset Value per Share at which the Performance Fee was last crystallised (the "High on High Model").

In that case, the Performance Fee will be calculated as a percentage of the excess of performance between the Net Asset Value per Share at the end of the reference period and the performance over the same reference period.

In case the subfund incurred any underperformance or loss during the last five (5) performance reference period preceding each relevant Crystallisation Date, such underperformance must be recovered before a Performance fee is paid.

High water mark model

In case of the high water mark model, the Performance Fee will be equal to a specific percentage set out in the relevant Supplement of the over-performance of the relevant subfund compared to a high water mark (the "**HWM Model**"). The increase will be calculated by comparing the Net Asset Value per Share of the end of the reference period to the high water mark per Share.

The high water mark is equal to the highest Net Asset Value per Share reached on the previous reference period or since inception, as further set out in the relevant Supplement. The HWM Model ensures that in case of loss, no performance fee will be paid until the loss has been recovered.

In case the subfund incurred any underperformance or loss during the last five (5) performance reference period preceding each relevant Crystallisation Date, such underperformance must be recovered before a Performance fee is paid.

Benchmark model

Pursuant to the benchmark model, the amount of the Performance Fee depends on the performance of the Net Asset Value per Share of the relevant Share Class compared to the performance of the relevant performance benchmark (the "**Benchmark Model**"). For a specific Share Class, the Performance Fee rate equals a certain percentage of the over-performance of the subfunds versus its relevant benchmark over the reference period, as further specified in the relevant subfund's Supplement.

In case the subfund incurred any underperformance or loss during the last five (5) performance reference period preceding each relevant Crystallisation Date, such underperformance must be recovered before a Performance fee is paid.

No Performance Fee shall be paid in case of absolute negative performance of the Net Asset Value per Share of the relevant Share Class, even in case the performance of the subfund is higher than the performance of the relevant benchmark.

Depositary Fees

The Depositary will be entitled to an annual fee equal to a percentage of the Net Asset Value of each subfund consistent with market practice in Luxembourg, subject to a minimum flat fee per subfund of EUR 30 000 per annum and a maximum rate of up to 0.085 percent (0.085%) per annum. The Depositary fee will be calculated by reference to the Net Asset Value of each subfund at the rate specified in the Supplement of the Prospectus for each subfund or Share Class calculated on each Valuation Day and be payable on a monthly basis in arrears. The Depositary will also be entitled to transaction fees charged on the basis of the investments made by each subfund consistent with market practice in Luxembourg. Fees paid to the Depositary may vary depending on the nature of the investments of each subfund and the countries and/or markets in which the investments are made. The Depositary will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred

in carrying out its duties. Further fees may be payable to the Depositary in consideration of ancillary services rendered to the Fund and relating to the core services of the Depositary.

Administration Fees

The Administrator will be entitled to an annual fee equal to a percentage of the Net Asset Value of each subfund consistent with market practice in Luxembourg, subject to a minimum flat fee per subfund of EUR 30 000 per annum and a maximum annual rate of up to 0.08 percent (0.08%) per annum. The Administrator fee will accrue on each Valuation Day and will be payable monthly in arrears. The Administrator will also be entitled to reimbursement of reasonable out-of-pocket expenses properly incurred in carrying out its duties.

Further fees may be payable to the Administrator in consideration of ancillary services rendered to the Fund and relating to the core services of the Administrator.

Directors' fees and expenses

The members of the Board of Directors are entitled to receive a fee in consideration for their function. The Fund will also reimburse the members of the Board of Directors for appropriate insurance coverage and expenses and other costs incurred by the members of the Board of Directors in the performance of their duties, including reasonable out-of-pocket expenses, traveling costs incurred to attend meetings of the Board of Directors, and any costs of legal proceedings unless such costs are caused by intentional or grossly negligent conduct by the member of the Board of Directors in question. The Fund may also pay fees and expenses to members of any committee established by the Board of Directors, where applicable.

Operating and Administrative Expenses

The Fund bears all ordinary operating costs and expenses incurred in the operation of the Fund or any subfund or Share Class ("Operating and Administrative Expenses") including but not limited to costs and expenses incurred in connection with:

- preparing, producing, printing, depositing, publishing and/or distributing any documents relating to the Fund, a subfund or Share Class that are required by applicable laws and regulations (such as the Articles of Association, the Prospectus, key investor information documents, financial reports

and notices to investors) or any other documents and materials made available to investors (such as explanatory memoranda, statements, reports, fact-sheets and similar documents);

- other fees in relation to the establishment and launch of the Fund;
- organising and holding general meetings of shareholders and preparing, printing, publishing and/or distributing notices and other communications to shareholders as well as other corporate secretarial services;
- professional advisory services (such legal, tax, accounting, compliance, auditing and other advisory services) taken by the Fund or the Management Company on behalf of the Fund;
- investment services taken and/or data obtained by the Fund or the Management Company on behalf of the Fund (including fees and expenses incurred in obtaining investment research, systems and other services or data utilised for portfolio and risk management purposes), further information concerning the amount of research costs applicable to the relevant subfund in which they are invested being available to the shareholders at the registered office of the Fund;
- the authorisation of the Fund, the subfunds and Share Classes, regulatory compliance obligations and reporting requirements of the Fund (such as administrative fees, filing fees, insurance costs and other types of fees and expenses incurred in the course of regulatory compliance), and all types of insurance obtained on behalf of the Fund and/or the members of the Board of Directors;
- initial and ongoing obligations relating to the registration and/or listing of the Fund, a subfund or Share Class and the distribution of Shares in Luxembourg and abroad (such as fees charged by and expenses payable to financial regulators, distributors, correspondent banks, representatives, listing agents, paying agents, fund platforms, and other agents and/or service providers appointed in this context, as well as advisory, legal, and translation costs);
- due diligence fees, fees for the update of procedures and ancillary services based on applicable laws and regulations charged by the Management Company to the Fund;
- fees for domiciliation and transfer agency services;
- the determination and publication of tax factors for the EU/EEA Member States and/or any other countries where distribution licences and/or private placements exist, according to the actual expenditure incurred at market rates;

- memberships or services provided by international organisations or industry bodies such as the Association of the Luxembourg Fund Industry (ALFI);
- taxes, charges and duties payable to governments and local authorities (including the Luxembourg annual subscription tax (taxe d'abonnement) and any other taxes payable on assets, income or expenses) and any value added tax (VAT) or similar tax associated with any fees and expenses paid by the Fund; and
- the reorganisation or liquidation of the Fund, a subfund or Share Class.

Note 3 – Taxe d'abonnement

According to the law and practice currently in force, the Fund is not liable to any Luxembourg tax on withholding, income, capital gains or wealth taxes. The Fund is, however, liable in Luxembourg to a tax of 0.05% per annum ("Taxe d'Abonnement") of its net asset value, such tax being payable quarterly on the basis of the value of the net assets of the Fund at the end of the relevant calendar quarter or 0.01% per annum for the Classes of shares dedicated to institutional investor as defined from time to time by the Luxembourg laws and regulations.

Note 4 – Commitments on Options

Commitments on Options per subfund and respective currency as of 31 December 2023 can be summarised as follows:

Options

SULA UCITS SICAV	Options on indices, classic-styled (sold)
– FLEXIBLE ALPHA FUND	427 765.81 EUR

The commitments on Financial Futures on currencies or index (if any) are calculated based on the market value of the Financial Futures (Number of contracts*notional contract size*market price of the futures).

Note 5 – Transaction costs

Transaction costs include brokerage fees, stamp duty, local taxes and other foreign charges if incurred during the fiscal year. Transaction fees are included in the cost of securities purchased and sold.

For the year ended on 31 December 2023, the Fund incurred transaction costs relating to purchase or sale of investments in securities and similar transactions as follows:

SULA UCITS SICAV	Transaction costs
– FLEXIBLE ALPHA FUND	90 981.05 EUR

Not all transaction costs are separately identifiable. For fixed income investments, forward currency contracts and other derivative contracts, transaction costs will be included in the purchase and sale price of the investment. Whilst not separately identifiable these transaction costs will be captured within the performance of each subfund.

Note 6 – Subsequent event

There were no events after the year-end that require adjustment to or disclosure in the Financial Statements.

Note 7 – Official language

The English version of these financial statements is the authoritative version and only this version was audited by the auditor. However, in the case of Fund shares sold to investors from other countries in which Fund shares can be bought and sold, the Fund and the Depositary may recognize approved translations (i.e. approved by the Fund and the Depositary) into the languages concerned as binding upon themselves.

Appendix 1 – Global Exposure (unaudited)

Risk management

Risk management in accordance with the commitment approach and the value-at-risk approach is applied pursuant to the applicable laws and regulatory provisions.

Leverage

Leverage is defined pursuant to the applicable ESMA directives as the total of the notional values of the derivatives used by the respective subfund. According to this definition, leverage may result in artificially increased leverage amounts, as some derivatives that can be used for hedging purposes may be included in the calculation. Consequently, this information does not necessarily reflect the precise actual leverage risk that the investor is exposed to.

Subfund	Global risk calculation method	Model used	Min VaR (%)		Max VaR (%)		Avg VaR (%)		Avg Leverage 31.12.2023 (%)	Reference portfolio (benchmark)
			VaR 20d	VaR 1d	VaR 20d	VaR 1d	VaR 20d	VaR 1d		
SULA UCITS SICAV – FLEXIBLE ALPHA FUND	VaR approach	Historical VaR	0.300%	0.068%	3.08%	0.688%	0.75%	0.168%	14.129%	n/a

Appendix 2 – Securities Financing Transaction Regulation (SFTR) (unaudited)

Transparency of securities financing transactions and their reuse

No securities financing transactions or total return swaps within the meaning of Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 (“SFTR”) were used by the Fund. As a result, no disclosures within the meaning of Article 13 of said Regulation need to be made to investors in the annual report.

Appendix 3 – Remuneration Policy and quantitative disclosure (unaudited)

Waystone Management Company (Lux) S.A. (Henceforth, “Waystone”, “WMC Lux”, or the “Company”) has adopted a remuneration policy in accordance with the applicable regulatory framework, particularly:

- The ESMA Guidelines on sound remuneration policies under the UCITS Directive of 14 October 2016 (ESMA/2016/575) and the ESMA Guidelines on sound remuneration policies under the AIFMD (ESMA/2013/232, as amended by ESMA/2016/579),
- The Law of 17 December 2010 relating to undertakings for collective investment,
- The Law of 12 July 2013 on alternative investment fund managers, and
- The CSSF Circular 18/698 of 23 August 2018 on the Authorization and organization of investment fund managers incorporated under Luxembourg law.

Through its remuneration policy, and as prescribed by the Sustainable Finance Disclosure Regulation [Regulation (EU) 2019/2088 of 27 November 2019 or the “SFDR”], the Company ensures that the structure of its remuneration does not encourage excessive risk taking with respect to sustainability risks when performing its activities as AIFM/Management Company, while it promotes sound and effective risk management with respect to sustainability risks.

Details of Waystone’s remuneration policy, including the persons in charge of determining the fixed and variable remunerations of staff, a description of the key remuneration elements, and an overview of how remuneration is determined, is available under <https://www.waystone.com/waystone-policies/>.

With respect to the financial year ended 31 December 2023 (when, as of that date, WMC Lux had a headcount of 83 employees), the total fixed and variable remuneration paid by the Company to its employees amounted to EUR 8 084 973 and EUR 714 783 respectively.

The total remuneration paid by the Company to senior management and members of its identified staff whose actions have a material impact on the risk profile of the collective investment schemes managed amounted to EUR 3 872 522.

The Company’s remuneration committee has reviewed the implementation of the remuneration policy and has not identified any deficiency in that respect. Moreover, the current version of the remuneration policy was updated and approved by the Board of directors in the financial year ended 31 December 2023, being the current version dated of November 2023.

The remuneration policy was reviewed and approved by the Board of Directors on 29 November 2023.

Appendix 4 – Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) (unaudited)

For the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (known as the Disclosure Regulation, ESG Regulation or “SFDR”), which is part of a broader legislative package under the European Commission’s Sustainable Action Plan, came into effect on 10 March 2021. Sustainability risks mean an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of a subfund’s investment. Sustainability risks can either represent a risk of their own or have an impact on other risks and may contribute significantly to risks, such as market risks, operational risks, liquidity risks or counterparty risks. Assessment of sustainability risks is complex and may be based on environmental, social, or governance data which is difficult to obtain and incomplete, estimated, out of date or otherwise materially inaccurate. Even when identified, there can be no guarantee that these data will be correctly assessed. The Delegated Investment Managers is paying particular attention to the governance, environmental and social impact aspects of the companies applying for the investment. Sustainability risks are considered throughout the investment process of the Delegated Investment Managers by considering certain sectors and companies that may have increased exposure to environmental and social risk. Sustainability risks are not a core part of the investment strategy and are currently not deemed relevant nor expected to have a material impact on the returns of the subfunds due to the diversification of the portfolio. The Delegated Investment Managers is evaluating the actions to be taken so that these factors are more fully integrated in harmony with SFDR and related regulations. The Investment Manager is currently not in a position to consider principal adverse impacts of investment decisions on sustainability factors due to a lack of available and reliable data. The Management Company does not consider adverse impacts of investment decisions on sustainability factors. The main reason is the lack of information and data available to adequately assess such principal adverse impacts. When the Management Company will consider the adverse impacts of its investment decisions on sustainability factors, the related disclosures on its website and in the Prospectus will be updated accordingly at the next possible time.

The investment underlying this subfund do not take into account the EU criteria for environmentally sustainable economic activities.