

**Questions:**

10. Do you consider it appropriate for Fund Managers to disclose the maximum leverage of the fund it manages to fund investors?

INV: Our Luxembourg domiciled funds comply with ESMA requirements which require funds to disclose the average leverage in the annual report. Therefore, we prefer average leverage over maximum leverage.

11. Do you have any comments on how leverage should be calculated?

INV: The manager should be given some discretion here. On the leverage disclosure for commitment funds, there is no prescribed methodology so our recommendation would be to use the UCITS commitment approach method where the regulatory limit is 100%.

14. Do you have any comments on the suggested risk-management control techniques and procedures as set out in Appendix 2?

INV: We believe the manager should be given some discretion here. Under the UCITS regime, long only vanilla portfolios are dispensed from reporting most of the items in Appendix 2. VaR and stress test for example are only required for fund's where it uses VaR approach (with extensive use of derivatives). We suggest to apply this techniques and procedures on VaR approach funds only.