

Orchestra Private Equity Compliance Policy

Effective Date: November 1, 2021

Compliance Policy

The investments and operations of Orchestra Private Equity (“OPE”) span across multiple geographies with fund investors from all around the world. Compliance is a fundamental philosophy of OPE, essential to ensure OPE’s continuing existence and success.

OPE is committed to ensure that it complies with all applicable laws and regulations, and that it strives to meet the requirements of those standards and codes of practice that apply to its day-to-day operational activities and responsibilities.

Through adopting a stringent and yet practical approach, coupled with a framework comprising of policies, codes of conduct, rules and procedures, OPE is able to meet regulatory objectives to protect investors and ensure that markets are fair, efficient and transparent while reducing system risks and eliminating financial crimes.

In addition to regulatory objectives, OPE’s compliance policy is formulated to instill investors’ confidence in OPE with governance over key concerns of risk management, marketing, communications, data privacy, conflicts of interest, insider trading, client assets and monies as well as rule-breaking and errors.

Orchestra Private Equity Compliance Manual

Orchestra Private Equity (“OPE”) is committed to ensuring that it complies with all applicable laws and regulations, and that it strives to meet the requirements of those standards and codes of practice that apply to its day-to-day operational activities and responsibilities.

In line with the commitment, OPE has developed a compliance framework documented under a Compliance Manual which:

- Demonstrates a commitment to the highest standards of ethics and compliance with all applicable laws, regulations, rules, and policies and promote a culture of compliance.
- Promotes a culture of frank and open disclosure of compliance breaches without fear of victimization or unfair treatment.
- Documents and continuously reviews and updates business processes to ensure they comply with applicable laws and regulations.
- Provides employees with training and assistance to become effectively involved in compliance activities to meet their obligations.
- Maintains monitoring, control and reporting systems to identify instances of non-compliance or system failure and to protect OPE, its investors, employees, vendors, and associates from deliberate or inadvertent breaches and consequent penalty.
- Takes prompt actions where necessary to address instances of non-compliance or other circumstances that present an unacceptable exposure to legal risk.
- Assesses compliance against predetermined objectives and assessment criteria.

All employees of OPE are mandated to read, acknowledge (by signing) and comply with the standards, rules, policies and guidelines stated in the Compliance Manual. There are also provisions within the Compliance

Manual which survive the post-employment of OPE ex-employees. Within the Compliance Manual, it comprises of several key areas and policies as follows: Anti-Money Laundering, Market Misconduct, Prevention of Corruption, Privacy Regulations, Record Keeping, Ethical Business Conduct, Risk Management, Business Continuity Plan, Outsourcing Policy, IT and Cybersecurity Policy, and Elimination of Relationships with Antisocial Forces (Japan).

OPE's Compliance Manual is an internal company document. Access to OPE's Compliance Manual is only privileged to its investors, auditors, and government authorities, on a need-to-know basis.

Orchestra Private Equity Compliance Policy and Compliance Manual is subject to annual reviews to reflect changes in OPE's business, regulatory and operating environment.

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