Laser Digital Middle East FZE

VA Management and Investment Services Disclosure

August 2026

Definitions

Unless otherwise defined below, capitalised terms have the meanings assigned in applicable offering documentation, which is available free of charge upon reasonable request under a non-disclosure agreement.

- **AIFMD:** Directive 2011/61/EU on Alternative Investment Fund Managers.
- **AIFM Rules:** Commission Delegated Regulation (EU) No 231/2013.
- **Asset Management (Services):** Collective and/or individual portfolio management services.
- **Business Day:** Any day except Saturday, Sunday, legal holidays, or banking closures.
- **Company:** Laser Digital Funds SPC.
- **Digital Assets or Virtual Assets:** A digital representation of value transferable and stored electronically via distributed ledger technology.
- **Director:** Director of Laser Digital Funds SPC.
- **Fund:** Collective investment scheme under LDME management.
- **LDG:** All subsidiaries directly or indirectly controlled by LDGH.
- **LDH:** Laser Digital Holding AG.
- **LDGH:** Laser Digital Group Holdings AG.
- **LDME:** Laser Digital Middle East.
- **Shares:** Investor shares in a Fund.

General Disclosures

As at the date of this document, LDME is the sole LDG entity managing Funds open to third-party investors within this disclosure's scope. LDME does not provide receipt and transmission of client orders.

Client and Investor Classification

Laser's record clients are:

- Funds where LDME serves as investment manager pursuant to an investment management agreement (IMA).
- Individuals with discretionary portfolio management agreements (DPMA).

As at this date, LDME has been appointed investment manager for several LD Funds. LDME has not been appointed portfolio manager for individual investors through managed account structures.

Term Definition: 'Client' refers to:

- A Fund, when LDME acts as investment manager.
- The relevant individual or entity receiving individual or discretionary portfolio management services.

Fund subscribers are designated 'Investors' rather than clients.

Conflicts of Interest

General Approach

Actual and potential conflicts of interest exist in the Fund structure and operation that may materially and adversely affect investors. LDME may face conflicts when providing services to multiple Funds. As the business evolves, new conflicts may emerge; this disclosure is not exhaustive regarding all potential conflicts. LDME maintains a conflict of interest policy detailing how potential or actual conflicts are handled.

Specific Conflict Situations

Related Entity Involvement: LDME acts and intends to act as investment manager for funds with founder shareholders within LDG that may also invest as investors—specific rights and conditions apply to such investments. Management personnel in LDME and/or LDG may hold executive roles within the aforementioned funds and/or be involved in operations and distribution.

Service Provider Arrangements: Funds managed by LDME may appoint service providers from LDG entities (including Nomura Group) for services including trade execution. Terms are either negotiated at arm's length or on conditions more favourable than open market alternatives.

Potential Conflict Categories

Conflicts may arise between:

- LDME and/or group members and Fund(s).
- LDME and/or group members and Fund investors.
- Multiple investors within Fund(s).
- Individuals in LDME or group members and the organisation itself.
- Individuals in LDME or group members and Fund(s).
- Fund and service providers other than LDME.
- LDME and its service providers.
- Individuals in LDME or group members and Fund investors.

Control Function Independence: Control functions within funds and LDME are independent from business units providing regulated activities.

Side Letters

LDME may enter into side letters concerning Funds. As at the date of this document, LDME and Laser Digital Ethereum Adoption Fund SP executed a side letter with one anchor investor establishing:

- More frequent and detailed information and periodic reporting.
- Reduced hold-back amount.
- Limitation of liability capped at the invested amount.
- Dedicated representations and warranties.
- A Most Favoured Nation clause.

Other Clients

Directors, LDME, the fund administrator, external valuer, prime broker, auditor, and custody provider may serve as director, procurement agent, investment manager, custodian, registrar, broker, administrator, depositary services provider, clearing broker, investment adviser, distributor, or dealer for other investment funds, vehicles, and accounts with similar or different objectives and assets ('Other Clients'). Potential conflicts of interest may arise regarding duties to the Company.

Fee and Expense Variations

Fee and expense levels that LDME and affiliates receive from each Fund and Other Clients may vary. Fund fees may be lower than Other Client charges. LDME and affiliates may hold significant investments in certain Other Clients. As a result, the Investment Manager and affiliates may have an incentive to favour accounts paying higher fees or expenses or with greater proprietary interest, including in investment allocation, time, and attention.

Time and Activity Allocation

Investment Manager conflicts may arise in allocating time and activity between each Fund and Other Clients, particularly where greater financial interest exists in Other Clients.

Allocation of Investment Opportunities

Neither the Investment Manager nor affiliates nor connected persons are obligated to offer investment opportunities discovered by them to each Fund, nor account for transactions or benefits received. The Investment Manager and affiliates will allocate such opportunities equitably between each Fund and Other Clients. An order execution policy summary is available upon investor request. Material policy changes require AIFM Rules notification to Investors.

Order Aggregation

When appropriate, the Investment Manager may (but need not) aggregate orders from each Fund and Other Clients for efficient execution or equitable treatment. Fund and Other Client aggregated trade participants receive securities or Digital Assets allocated at the average achieved price.

Cross Trades

Accounts managed by the Investment Manager or affiliates may engage in cross trades where identical assets are simultaneously bought or sold or covered or shorted by a Fund and Other Clients, or inter-fund or inter-account transactions (including rebalancing from subscriptions or redemptions). Cross trades occur either through open market trading or direct account transfers, executed at market value. Additional conflict-of-interest procedures apply as required by law.

Portfolio Rebalancing Through Cross Trade

The Investment Manager may rebalance client portfolios through cross trades, selling one portfolio position to another. One portfolio increases exposure while another decreases, causing subsequent price movements to generate different gain or loss outcomes. Cross-trade rebalancing provides advantages to both portfolios—lower transaction costs and better or equal pricing versus public market alternatives.

Valuation

Under the Investment Management Agreement, the Investment Manager holds certain valuation responsibilities for Fund assets, Net Asset Value calculation, and publication per AIFM Rules. A potential conflict exists between Investment Manager involvement in valuation or calculation processes and entitlement to Management Fee and Performance Fee (both linked to Net Asset Value). The Administrator, appointed to calculate Net Asset Value, faces a similar conflict given fee basis on Net Asset Value.

Allocation of Expenses

Each Fund bears its own expenses as described and set out in the relevant Supplements. The Investment Manager may have Other Clients in the future. Each Other Client bears expenses per respective investment management agreement and/or offering document. Expenses may differ between Funds and Other Clients. Each Fund may bear pro rata expenses that the Investment Manager has agreed to bear for it and one or more Other Clients.

Common Expense Allocation

Common expenses may be incurred on behalf of each Fund and one or more Other Clients. The Investment Manager seeks to allocate these fairly and reasonably over time, though decisions involve potential conflicts of interest (favouring accounts paying higher performance fees or presenting different expense arrangements). Common expenses are typically allocated pro rata among each Fund and Other Clients based on relative assets under management.

The Investment Manager may use other allocation methods if deemed more appropriate based on:

- Relative product or service use.
- Product or service nature or source.
- Relative benefits derived by each Fund and Other Clients.
- Other relevant factors.

For any particular product or service, the common expense portion allocated to a Fund may not reflect that Fund's relative benefit in any specific instance. Expense allocations depend on inherent subjective determinations; allocations made in good faith are final and binding on each Fund.

Co-Investments

The Investment Manager may (but need not) provide co-investment opportunities to third parties, including shareholders, strategic investors, and non-affiliated third parties. Co-investment opportunities are determined solely by the Investment Manager. Investors desiring co-investment participation may not receive the full or any amount of desired co-investment.

When offering co-investment to particular third parties, the Investment Manager considers:

- Whether the co-investor provides strategic value to the Investment Manager and clients.
- Prior experience with the co-investor (if any).
- Legal, tax, and regulatory matters.
- Third-party prior interest expression in co-investment participation.

The Investment Manager (or its directors, officers, or employees) may directly or indirectly participate in co-investments, reducing third-party availability. Terms applicable to any co-investment opportunity are established solely by the Investment Manager. Co-investors may not be subject to any fee.

Directors of the Company

The Company has appointed a Board of Directors where two individuals are employed by the Investment Manager and an Investment Manager affiliate (an LDH subsidiary holding Founder Shares). This situation may create conflicts given that the Investment Manager receives Management Fee and may receive Performance Fee.

Director Roles and Interests

Directors may be directors of:

- Other investment funds or vehicles (or general partner or managing member thereof) with assets managed by the Investment Manager or affiliates.
- Other funds or vehicles managed by other managers.
- Companies or vehicles in which the Company may invest or be exposed to.

Conflict Management: No Company agreement or transaction with a Director or related person is void or voidable solely because of Director interest or Director presence at Director meeting approval, provided the Director's interest is disclosed in good faith to or known by other Directors. A Director with business interest at a Director meeting may be counted toward determining proper meeting constitution.

Where a Director holds a financial or personal interest in a Fund counterparty, service provider, or co-investor, that Director must disclose the interest, is excluded from all deliberation and decision-making relating to that matter, and the remaining non-conflicted Directors determine the matter independently, applying the Company's standard due diligence and approval criteria.

Brokerage and Execution

The Investment Manager may enter agreements (in its own right or on Fund behalf) with Company brokers, including Prime Broker. Investment Manager personnel may use such broker services and may speak at

conferences or programmes sponsored by those brokers for potential hedge fund investors. These conferences or programmes may introduce the Investment Manager to potential Fund investors.

Affiliate Services: The Investment Manager may engage affiliates for execution services. This engagement involves conflict of interest.

Main Custody Services Provider

Komainu Structure: Komainu is a joint venture between Coinshares, Nomura Holdings, Inc. (transferred to Laser Digital), and Ledger SAS. An LDG entity (of which the Investment Manager is part) partially owns Komainu. A potential conflict exists between the Investment Manager's investment role for Fund assets and Komainu's fee entitlement, generally based on aggregate Digital Assets held in relevant wallets.

External Valuer

The External Valuer is an Investment Manager affiliate and LDG entity with LDH as direct parent entity (holding Founder Shares). A potential conflict exists between External Valuer involvement in asset valuation and Net Asset Value calculation processes and the Investment Manager's entitlement to Management Fee and Performance Fee (both linked to Net Asset Value). The valuation function is kept separate from risk management and portfolio management functions regarding the Company and its Fund(s).

Investment in the Fund

Directors, the Investment Manager, and the Investment Manager's and affiliates' directors, members, partners, officers, shareholders, and agents may directly or indirectly subscribe for, hold, and redeem Shares. Such investors may possess Fund, Company, portfolio, and Investment Manager personnel information unavailable to other Investors and prospective investors. Investment Manager personnel investments could incentivise risk profile increase or decrease.

Personal Account Trading

The Investment Manager and affiliates maintain internal compliance policies restricting employee personal trades, including:

- Periodic securities and Digital Asset holdings and transactions disclosure.
- Pre-clearance requirement for certain personal securities or Digital Asset transactions.

Subject to internal compliance policies and approval procedures, members, partners, directors, shareholders, officers, and employees may engage in personal securities or Digital Asset trading, including securities or Digital Assets in which a Fund may invest. The Investment Manager, affiliates, and respective members, partners, directors, shareholders, officers, and employees may give advice or take action for their own accounts that differs, conflicts, or adversely compares to Fund advice or action. These activities may adversely affect prices and availability of Fund securities or Digital Assets, or potentially considered Fund purchases.

General Conflict Management

The Investment Manager will at all times regard its Fund obligations and endeavour to ensure fair conflict resolution. Directors seek to ensure appropriate conflict avoidance steps and, where arrangements are insufficient to prevent Investor interest damage with reasonable confidence, each Fund will clearly disclose those conflicts. Described conflicts are handled per the Investment Manager's conflict of interest policy, and in accordance with the LDG Group Conflicts of Interest Policy and the LDG Group Conflicts of Interest Procedure, which set out how conflicts are identified, escalated to Group Legal & Compliance, and monitored on an ongoing basis across LDG. A summary is available upon Investor request. By subscribing for and acquiring Shares, each Investor is deemed to acknowledge actual and potential conflict existence and waive, to the fullest extent permitted by applicable law, any claim regarding such conflicts.

Control Functions

Control functions within funds and LDME are independent from business units providing regulated activities. While asset valuation is performed by a separate entity from LDME and by individuals other than those performing portfolio management activities, the external valuer is an LDG entity. Risk mitigation includes:

- Valuation framework establishment (disclosed in fund offering documentation).
- Independent auditor appointment.
- Independent fund administrator appointment (entrusted with fund NAV calculation).

Policies and Procedures

Privacy Policy: Available on our website at Laser Digital – Privacy Policy.

Complaints Handling: Available on our website at Complaints Handling Policy.

Internal Whistleblowing Policy: Available on our website at Whistleblower Policy.

Asset Withdrawal

LDME intends to serve Funds and similar collective investment vehicles as clients when providing VA management services. Virtual Assets invested by LDME on Fund behalf are held in custody by regulated third-party custodians (Komainu or similar) for fully segregated Digital Asset handling. Fiat currency is held at regulated credit institutions. LDME's own assets and fund assets will not be co-mingled.

Redemption: Underlying Fund investors may place redemptions per Fund redemption policies disclosed in offering documentation. Redemption gates, notices, delayed or deferred redemptions, lock-ups, and similar arrangements follow market standards to prevent Fund prejudice or disorderly asset liquidation potentially harmful during extreme volatility. Redemptions may range from daily, weekly, to monthly depending on Fund specifics.

Use of Virtual Assets

LDME intends to manage virtual assets per offering documentation provisions for each Fund under management, considering specific investment strategies and objectives. Activities may include purchasing, selling, borrowing, lending, or otherwise disposing (including pledging or rehypothecating). Relevant agreements with funds and offering documentation include appropriate disclosures.

In accordance with the VARA VA Management and Investment Services Rulebook (Part II, Section D — Impermissible Activities), LDME shall not authorise or permit rehypothecation of Virtual Assets for which it provides VA Management and Investment Services unless it has obtained explicit prior consent from the relevant client to do so. LDME shall only use or exercise authority relating to a Virtual Asset based on valid authorisation and/or specific instructions from the client. Virtual Assets of a client used by LDME in the course of, or in connection with, the provision of any VA Management and Investment Services shall be held on behalf of the client unless the Client Agreement expressly states otherwise.

In accordance with the VARA VA Management and Investment Services Rulebook (Part II, Section H — Management Practices), when providing VA Management and Investment Services in respect of Virtual Assets on behalf of clients, LDME shall act in the best interests of its clients at all times. Factors considered when assessing a client's best interests may include, but are not limited to, client suitability, the price of Virtual Assets, costs, speed, likelihood of execution and settlement, size, nature, conditions of custody, and such other conditions as are relevant to the management of Virtual Assets, provided that LDME shall act in accordance with any specific instructions provided by the client.

Virtual assets in Fund portfolio (unless pledged or subject to title transfer or similar disposal arrangements expressly provided for in the relevant Client Agreement) will not be used for LDME purposes nor co-mingled with LDME assets.

Counterparty Risk and Client Asset Protection

LDME shall adopt best efforts to manage counterparty risks in accordance with applicable industry standards and the VARA VA Management and Investment Services Rulebook.

In accordance with VARA Rule I.B.1, LDME is required to publish and maintain the following disclosures in relation to client asset protection: a statement as to LDME's arrangements for the protection of clients' assets and how it determines uses of client Virtual Assets; a statement as to how LDME protects client Virtual Assets from counterparty risk; and a statement as to how, in the course of the provision of VA Management and Investment Services, client Virtual Assets are used and how clients' interests in respect of those Virtual Assets are thereby respected.

In accordance with VARA Rule I.A.1, LDME maintains written internal policies and procedures relating to the ability of clients to have access to and withdraw their Virtual Assets, including during periods of high uncertainty and/or extreme volatility.

In accordance with VARA Rule J.1 of the VA Management and Investment Services Rulebook, LDME ensures that liquidity risk and market risk are each monitored and tested regularly, with appropriate measures put in place to address any such risks promptly. In accordance with Rule J.2, all such risk management and due diligence is regularly audited by an independent third party and available to VARA upon request.

Key Arrangements

Provider Selection: LDME appoints providers only after performing solid due diligence including analysis of the regulatory status of the parties involved, well-defined and structured internal approvals processes, and strong risk management practices (including crypto exchange trading or regulated execution desk routing). This approach is consistent with the requirements of the VARA Compliance and Risk Management Rulebook applicable to all VARA-licensed VASPs.

Custody: Long-term custody is conducted by entities ensuring asset segregation or equivalent safeguards. Other suitable arrangements may be identified for trading or short-term custody when deemed reasonably beneficial. LDME uses Komainu MEA FZE, which holds a full VASP licence granted by VARA in August 2023 for VA Custody Services including custodial staking, as its primary custody provider.

LDME Custody Limitation: LDME itself does not and shall not keep Virtual Asset custody. In accordance with VARA Rule D.3 of the VA Management and Investment Services Rulebook, Virtual Assets of a client used by LDME in the course of the provision of VA Management and Investment Services shall be held on behalf of the client unless the Client Agreement expressly states otherwise.

Counterparty risks may occur; extensive risk descriptions appear in each Fund's offering documentation.

Risks

Virtual Asset Risks

LDME is required by VARA Rule I.B.1(g) of the VA Management and Investment Services Rulebook to publish a statement explaining that client Virtual Assets used by LDME in the course of the provision of VA Management and Investment Services may be at risk, including the types and nature of such risks, and a statement on the likelihood and severity of any losses which may be suffered. This section constitutes that required disclosure.

Virtual Assets purchased by LDME for Fund(s) under management may face risk. Risks range from:

Market risk: the price of a Virtual Asset is subject to significant volatility and may decline substantially over short periods, including to zero.

Operational risk: including legal, regulatory, and reputational risk. The regulatory environment for virtual assets is evolving rapidly across jurisdictions and changes may materially affect LDME's ability to continue providing services in respect of particular Virtual Assets.

Financial risk: including counterparty default, insolvency of service providers, and loss of assets held with third-party custodians or on trading venues.

Liquidity risk: Virtual Assets may be illiquid and difficult to sell at advantageous prices, particularly during periods of market stress. In accordance with VARA Rule J.1, LDME monitors and tests liquidity risk regularly. Further details on liquidity risk management are set out in the Liquidity Risks section of this disclosure.

(Cyber)security risk: the cybersecurity risks of Digital Assets and related wallets and venues include hacking vulnerabilities, smart contract exploits, and the risk that distributed ledgers may not be immutable. A cybersecurity event could result in a substantial, immediate and irreversible loss for investors.

ICT risk: LDME's operations depend on the continued operation and integrity of information and communications technology systems. Failures or disruptions could impair LDME's ability to manage Fund assets or execute orders.

Currency risk: Virtual Assets may be denominated in or referenced to foreign currencies, and exchange rate movements may affect the value of investments and returns to investors.

Such risks may be higher for Funds investing in virtual assets than traditional assets due to the current state of market development and the inherent characteristics of virtual assets as an asset class. Fund investors may lose part or all of their capital invested. The likelihood and severity of potential losses will vary depending on the specific Fund strategy, market conditions, and the particular Virtual Assets held. Full risk description regarding Fund and/or end investor exposure appears in each product's offering documentation, which constitutes the primary risk disclosure document for investors.

In accordance with VARA Rule K.1(g), each Client Agreement sets out a statement explaining that client Virtual Assets used by LDME in the course of the provision of VA Management and Investment Services may be at risk, including the types and nature of such risks and the likelihood and severity of any losses which may be suffered.

Order Execution

LDME adopts an order execution policy available to clients upon demand. Orders may be executed with one or more counterparties, including through DeFi arrangements. Counterparties may include other LDG entities, executed at arm's length or at conditions deemed more favourable than open market alternatives. To the extent permissible under applicable regulatory approvals and segregation requirements, execution may involve LDME trading or execution desks and/or automated algorithms developed and operated by LDME and/or group entities. Offering documentation of each Fund includes provisions concerning execution order discretion and related risks.

Liquidity Risks

LDME and/or managed Funds may face varying liquidity risks depending on the pursued strategy and Fund features (e.g. redemption policies and dealing frequency). In accordance with VARA Rule J.1 of the VA Management and Investment Services Rulebook, LDME ensures that liquidity risk is monitored and tested regularly, with appropriate measures put in place to address any such risk promptly. All liquidity risk management is regularly audited by an independent third party and is available to VARA upon request in accordance with Rule J.2. In accordance with VARA Rule I.B.1(i), this section constitutes LDME's required public disclosure as to how liquidity risk is managed.

In accordance with VARA Rule I.A.1(a), LDME maintains written internal policies and procedures relating to the ability of clients to have access to and withdraw their Virtual Assets, including during periods of high uncertainty and/or extreme volatility.

Liquidity Definition

Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing Fund sales at advantageous prices or at all. Thin markets amplify volatility. Investment markets typically involve wider price spreads and greater buying or selling pressure sensitivity compared to active markets. In the context of virtual assets, liquidity conditions may change rapidly and without warning, including as a result of regulatory interventions, exchange outages, market dislocation, or loss of market confidence in a particular Virtual Asset.

Digital Asset Liquidity

Virtual Assets may be illiquid investments not easily or readily convertible to fiat currencies. Some Virtual Asset markets may be thinner than others. Consequently, Virtual Asset Fund purchases likely increase the portfolio illiquidity proportion. Though Funds manage liquidity risks across all investments on an ongoing basis, greater Digital Asset exposure increases the possibility that on any redemption day a Fund might lack sufficient liquid assets for payment of redemption proceeds to redeeming shareholders. A Fund may be forced to dispose of more liquid assets to fund redemptions, leaving remaining Investors with increased Digital Asset investment exposure and associated risks.

In accordance with VARA Rule I.B.1(c), LDME is required to publish a statement as to the ability of clients to have access to and withdraw their Virtual Assets, particularly in times of extreme volatility. In periods of extreme market volatility, access to and withdrawal of Virtual Assets may be subject to the redemption gates, notice periods, and liquidity management tools described in each Fund's offering documentation. LDME's policies and procedures governing client access and withdrawal rights are available upon written request.

In accordance with VARA Rule I.B.1(g) and Rule K.1(g), investors are advised that client Virtual Assets used by LDME in the course of the provision of VA Management and Investment Services may be at risk due to liquidity constraints, including the inability to realise assets at anticipated valuations during periods of market stress. The likelihood and severity of liquidity-related losses will vary depending on the specific Fund strategy, the composition of the portfolio, and prevailing market conditions at the relevant time.

Staking Strategy Implications

Staking strategy implementation increases Fund liquidity restrictions, as staked Virtual Assets may be subject to lock-up periods, unbonding periods, or slashing risk during which they cannot be readily liquidated. In accordance with VARA Rule G.1 of the VA Management and Investment Services Rulebook, LDME shall not represent in any marketing that its services involve the distribution of staking rewards unless the payments actually made to clients directly originate from such staking rewards or other protocol-based rewards. Dedicated staking strategy risk disclosure appears in the relevant Fund offering documentation.

Additional Limitations

Audit hold-back, per the relevant offering documentation, may reduce available redemption Fund amounts. Redemption gates, notices, delayed or deferred redemptions, lock-ups, and similar liquidity management arrangements follow market standards to prevent Fund prejudice or disorderly asset liquidation potentially harmful during extreme volatility. Redemptions may range from daily, weekly, to monthly depending on Fund specifics as described in the applicable offering documentation.

Other Disclosure

Senior Management: No senior management has been involved in any conviction or prosecution requiring VARA rules disclosure.

Risk Management: LDME maintains multiple group-level arrangements addressing market offence potential risks:

- Personal account dealing framework.
- Trade surveillance arrangements.
- Communication monitoring and recording.
- Internal and external audit measures.