

REPORT ON THE PLANNED MARKETING MODALITIES IN SPANISH TERRITORY

Name of the foreign CIS: Silverway Global – Apex Equity Fund (hereinafter, foreign UCI).

Name of the distributor of the foreign UCI: Silverway Asset Management, SGIIC, SL (hereinafter, the distributor).

IDENTIFYING DATA OF THE FOREIGN CIS

The identifying details of the foreign collective investment scheme (CIS) will be included in the simplified prospectus or equivalent document in the country of origin. The CIS is not incorporated in Spain and is marketed in Spain in accordance with Directive 2009/65/EC.

DISTRIBUTORS

Foreign CIS Distributors in Spain are entities authorized to market shares and units of Collective Investment Institutions and have been designated as distributors of the Foreign CIS in Spain, under the corresponding contracts and will be listed in the Foreign CIS' register at the CNMV.

RECORD OF SHARES/PARTICIPATIONS

The distributor must inform the investor how the shares/units will be registered:

a) In the name of the investor

In which case the investor may be charged any fees that the Distributor and the entity that performs the registration service of the shares/participations of the Foreign CIS have in force for said service in its fees prospectus.

b) By using a nominee

In this case, the shares/units subscribed by the investor will not be registered in their name in the records of the CIS but in the name of the Trustee, who will hold the shares/units on behalf of and representing the investors without prejudice to the internal breakdown that the distributors in Spain must keep to allow the accounting individualization of the position of each client, and these must carry out their operations directly through said distributors.

To this end, the distributor must obtain the client's written authorization, informing them beforehand of the risks they assume as a result of this ownership arrangement, as well as the creditworthiness of the entity acting as trustee. In the event of a change in the trustee, the investor will be informed in advance. The trustee will establish the appropriate ancillary accounting records, and the distributor will confirm to investors that the trustee holds the shares/units on their behalf.

Investors should be advised of the legal and tax consequences of registering shares/holdings using a "nominee".

SUBSCRIPTION AND REDEMPTIONS PROCEDURE

Subscription, redemption or exchange shares/units orders must be received by the distributor on a business day and before 1:00 PM. Orders placed after the closing time or received on a non-business day will be processed along with orders received on the next business day. The distributor will also confirm transactions to each investor, informing them of the date they were executed, the number of shares/units involved in the transaction, the price, and, where applicable,

any fees and expenses charged, as well as the exchange rates applied to any foreign exchange transactions carried out.

FEES AND EXPENSES

The Spanish investor will be responsible for any applicable expenses and fees as outlined in the prospectus of the Foreign CIS and the current maximum fees prospectus of the Distributor, which can be found on the website <https://silverway.com/>.

In the event that any currency exchange transaction is carried out in connection with the subscription or redemption of shares/units of the Foreign CIS, the costs of the transaction may be borne by the investor in accordance with the current fees prospectus.

INFORMATION OBLIGATIONS TO INVESTORS

Along with this document, the distributor must provide each investor, prior to subscription:

- a copy of the simplified prospectus or the document that replaces it in the home State of the CIS.
- a copy of the latest published economic content report.

This delivery is mandatory and cannot be waived by the investor. Additionally, upon request, an updated copy of the CIS' remaining official documentation must be provided. In any case, at least one of the marketing entities will allow access to all these documents, as well as the net asset values corresponding to the shares or units marketed in Spain, via electronic means (on the website <https://silverway.com/>).

The distributor will send investors, free of charge, to the address they have provided, subsequent economic reports and annual reports prepared after registration with the CNMV (Spanish National Securities Market Commission), within one month of their publication in the country of origin, unless investors have waived their right to receive them in a separate, duly signed written document after receiving the first periodic submission. However, the distributor will be obliged to send these documents to the investor or shareholder if they so request, even if they have waived their right to receive them. This waiver is revocable.

Likewise, it must send free of charge to the unitholders or shareholders who have acquired their units or shares in Spain, all the information provided for by the legislation of the State in which they have their headquarters, in addition to that indicated in this section, under the same terms and deadlines provided for in the legislation of the country of origin.

When the unitholder or shareholder expressly requests it, these reports of economic content will be sent to him/her by electronic means.

ADVERTISING OF THE NET ASSET VALUE

The net asset value of the foreign CIS can be found on the website <https://silverway.com/>.

ADVERTISING

In accordance with Article 15 of Law 35/2003, of November 4, on Collective Investment Schemes, the provisions of Spanish law relating to the advertising in Spain of foreign Collective Investment Schemes marketed under Directive 2009/65/EC must be respected.

TAX SYSTEM

Any income derived from shares/units received by investors resident in Spain, including dividends, coupons and capital gains, will be subject to tax in Spain in accordance with the legal and regulatory provisions of a tax nature in force in Spain at any given time.

Without prejudice to the regime applicable to listed funds, according to current regulations, the following are obliged to withhold or make a payment on account when redemptions are made:

- a) the marketing entities, financial intermediaries and, subsidiarily, the placement agents.
- b) The unitholder or shareholder who carries out the transfer or redemption in the event that the withholding practice by the entities indicated in the previous letter is not applicable.

Investors should inform themselves and take into account the current tax and exchange control regulations applicable to their personal circumstances in relation to the operations to be carried out in the Foreign CIS.

TERMINATION OF THE DISTRIBUTION AGREEMENT

In the event of termination or resolution of the distribution contract for any reason, the distributor will be obliged to continue in its functions until a new marketing entity has been registered in the Register of Foreign Collective Investment Schemes marketed in Spain of the CNMV to replace it.

The cessation of the active marketing of a sub-fund in Spain will not affect the compliance by foreign CIS and marketing entities with their obligations to investors and the CNMV in relation to that sub-fund, except in the case where there are no investors in Spain.

In the event of a merger between a foreign sub-fund or CIS with investors in Spain and an unregistered CIS or sub-fund of a CIS, investors must be informed of this and the potential tax consequences. In any case, the distributor will continue to act as such with respect to its investors regarding redemptions, information rights, and other obligations in accordance with the CIS' Marketing Report and prospectus.