Tax Policy

chrysalis investments

ABOUT CHRYSALIS

The Directors of the Company are committed to upholding the highest standards of business ethics in all its operations, including in respect of tax matters.

The Company is registered with the GFSC as a closed-ended investment company under RCIS Rule and Protection of Investors ("POI") Law and was incorporated in Guernsey on 3 September 2018. The Company operates under The Companies (Guernsey) Law, 2008 (the "Law").

The Company has a listing on the Main Market of the London Stock Exchange.

The Company is a non-EEA-domiciled Alternative Investment Fund ("AIF"), as defined for the purposes of the Alternative Investment Fund Managers Directive ("AIFMD"). The Company operates as a self-managed AIF and accordingly acts as its own Alternative Investment Fund Manager ("AIFM"). Responsibility for the portfolio management, valuation and risk management functions of the Company rests with the Board.

The Company is not formed of a group of companies. It has no employees and is governed by a Board of Directors formed of three independent members and an executive director who is responsible for leading the Company's realisation strategy. The Company executes most of its operations by outsourcing to third party service providers.

TAX STATUS

The Company's management and administration takes place in Guernsey and the Company has been granted exemption from income tax within Guernsey by the Administrator of Income Tax. It is the intention of the Directors to continue to operate the Company so that each year this tax-exempt status is maintained. The Company does not have tax obligations in other jurisdictions and so does not disclose country-by-country tax figures.

As the Company does not have employees it does not pay payroll tax or social security contributions.

TAX EVASION

In respect of the Criminal Finances Act 2017 and the offence of 'failing to take reasonable steps to prevent the facilitation of tax evasion', the Directors confirm that they are committed to zero tolerance towards the criminal facilitation of tax evasion.

TAX AVOIDANCE

The Directors confirm that the Company honours its tax obligations on cross-border transactions and does not use tax havens. The Company is not part of a group of companies and does not have a transfer pricing policy. The Company outsources most of its operations to third parties, many of which are based outside Guernsey. All transactions conducted with third parties are made on an arm's length basis under OECD Transfer Pricing Guidelines.

FOREIGN ACCOUNT TAX COMPLIANCE ACT ("FATCA")

FATCA requires certain financial institutions outside the United States ("US") to pass information about their US customers to the US tax authorities, the Internal Revenue Service (the "IRS"). A 30% withholding tax is imposed on the US source income and disposal of assets of any financial institution within the scope of the legislation that fails to comply with this requirement.

The Directors take all necessary steps to ensure that the Company is FATCA compliant and confirms that the Company is registered and has been issued a Global Intermediary Identification Number ("GIIN") by the IRS. The Company will use its GIIN to identify that it is FATCA compliant to all financial counterparties.

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COMMON REPORTING STANDARD

The Common Reporting Standard is a global standard for the automatic exchange of financial account information developed by the Organisation for Economic Co-operation and Development ("OECD"), which has been adopted in Guernsey, and which came into effect in January 2016.

The Company is subject to Guernsey regulations and guidance on the automatic exchange of tax information and the Directors take the necessary actions to ensure that the Company is compliant in this regard.

FINANCIAL ASSISTANCE FROM GOVERNMENTS

The Directors confirm that the Company does not seek and has not received financial assistance from any government.

REVIEW

This policy will be reviewed and approved periodically by the Board.