Interim unaudited Financial Statements for the period January 1, 2021 to June 30, 2021

Abbey Capital Limited is an Alternative Investment Fund Manager, regulated by the Central Bank of Ireland. Abbey Capital Limited is the Commodity Pool Operator of Abbey Capital Multi-Manager Fund Limited and operates it as an exempt pool pursuant to sub-section 4.7 of the Regulations issued pursuant to the Commodity Exchange Act, as amended. Abbey Capital Limited is a member of the National Futures Association ("NFA"), and is registered as an Investment Advisor with the Securities Exchange Commission ("SEC"). None of the regulators listed above endorse, indemnify, or guarantee the member's business practices, selling methods, the class or type of securities offered, or any specific security.

NFA ID: P029597

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A copy of the interim unaudited financial statements of the ACL Alternative Fund is included with these interim unaudited financial statements. The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited, a segregated accounts company incorporated as an openended investment company with limited liability under the Segregated Account Companies Act 2000 of Bermuda, as amended.

For the period ended June 30, 2021

## **Directory**

#### Registered Office: Victoria Place, 31 Victoria Street, Hamilton HM 10, Bermuda

#### Directors

Peter Carney (Non-Executive Director) Nicholas Hoskins

(Independent Non-Executive Director)

Roderick Forrest

(Independent Non-Executive Director)

#### **Listing Sponsor**

Hamilton HM 10

Harbour Financial Services Limited Victoria Place 31 Victoria Street

Bermuda

#### Legal Adviser

Conyers Dill & Pearman Clarendon House 2 Church Street Hamilton Bermuda

#### Corporate Secretary & Bermuda Registrar

M.Q. Services Limited Victoria Place 31 Victoria Street Hamilton HM 10 Bermuda Investment Manager

Abbey Capital Limited 1-2 Cavendish Row

Dublin 1 Ireland

#### **Auditor**

**KPMG** 

1 Harbourmaster Place

IFSC Dublin 1 Ireland

#### Administrator, Registrar & Transfer Agent

BNP Paribas Bank & Trust Cayman Limited

Buckingham Square

3<sup>rd</sup> Floor

720 West Bay Road Grand Cayman, KY1-1104

Cayman Islands

#### **Depositary**

BNP Paribas Securities Services, Dublin Branch Trinity Point

10-11 Leinster Street South

Dublin 2 Ireland

For the period ended June 30, 2021

## **Investment Manager's Report**

#### **Legal Structure**

Abbey Capital Multi-Manager Fund Limited (the "Fund") was incorporated in Bermuda on October 4, 2006 as an open-ended investment fund with variable capital and limited liability.

The Fund has created one Share Class namely the USD Share Class which is subdivided into five sub-classes; a USD A Share Class, a USD B Share Class, a USD C Share Class, a USD D Share Class and a USD E Share Class. The Fund offers investors monthly dealing and the NAV for the USD Share Class A is listed on the Bermuda Stock Exchange. The Directors have the power to issue further Share Classes in different currencies in the future.

Share Class in Issue	Launch Date	NAV per share as of June 30, 2021
USD A Share Class	January 2, 2007	\$150.06
USD B Share Class	August 3, 2009	\$140.64
USD C Share Class	October 1, 2010	\$104.29
USD D Share Class	January 3, 2011	\$122.69
USD E Share Class	December 1, 2017	\$117.28

The Fund is a feeder fund to the ACL Alternative Fund as it invests substantially all of its assets in the ACL Alternative Fund. The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited. ACL Alternative Fund SAC Limited is a segregated accounts company incorporated as an open-ended investment company with limited liability under the laws of Bermuda.

#### **Investment Objective and Strategy**

The investment objective of the Fund is to seek long-term capital appreciation for its shareholders within a rigorous risk management framework. The Fund aims to deliver its Investment Objective by investing in a range of trading strategies through a direct investment in the ACL Alternative Fund (the memorandum for this fund is available on request). The Investment Manager of the Fund is also the Investment Manager of ACL Alternative Fund and is responsible for choosing the Trading Advisors for that fund.

#### **Fund Performance to date**

The Fund's USD A Share Class ("ACMMF USD A") returned +9.19%(1) in the first six months of 2021. ACMMF USD A commenced trading in January 2007 and invests solely in the ACL Alternative Fund USD Share Class A. The ACL Alternative Fund USD Share Class A returned +11.49% in the first six months of 2021. Since inception in December 2000 the ACL Alternative Fund USD Share Class A has returned cumulatively +339.25%, providing an annualised return for the ACL Alternative Fund USD Share Class A of +7.45%(2).

"Abbey Capital Multi-Manager Fund Limited ("ACMMF") USD A Share Class commenced trading in January 2007 and invests solely in the ACL Alternative Fund USD Share Class A. All returns are net of fees and include interest. Please note that due to different fee structures within the ACMMF share classes, different share classes will have different returns. Some ACMMF share classes may have generated a lower return than the ACMMF USD A Share Class. Past results are not indicative of future results. Trading in managed futures is not suitable for all investors given its speculative nature and the high level of risk involved including the risk of total loss of initial investment.

<sup>(2)</sup>The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited. The ACL Alternative Fund (USD Share Class A) commenced as a program in December 2000 and was incorporated as a fund in January 2002. Return figures shown are net of fees and include interest. (Pro forma interest from December 2000 to April 2001 actual interest received thereafter). Past results are not indicative of future results. Trading in managed futures is not suitable for all investors given its speculative nature and the high level of risk involved including the risk of total loss of initial investment.

For the period ended June 30, 2021

# **Investment Manager's Report (continued)**

#### **Fund Performance to date (continued)**

The first six months of 2021 were generally positive for managed futures, with strong trends seen in equity and commodity markets. Within the ACL Alternative Fund, Trendfollowing drove positive performance over the six-month period. The non-trendfollowing trading styles were positive in aggregate, as gains from Short-term and Value outweighed losses from Global Macro.

Risk assets enjoyed a positive start to 2021. The reflation theme was a key focus for investors, as improving global economic data, the re-opening of the global economy and the prospect of increased fiscal spending in the US all contributed to a strong rally in equities and growth-sensitive commodities like energy and base metals.

Higher inflation expectations were another focus for investors, with the US 10-year inflation breakeven rate rising above 2.5% for the first time since 2013 in May. Survey-based data also showed signs of building price pressures in various industries and in May US CPI showed an annual increase of 5.0%, the largest increase since 2008. Forecasts of higher inflation acted as a tailwind for commodity prices, with many contracts hitting multi-year highs during the period.

Some central banks, including the Federal Reserve ("Fed"), dismissed the higher inflation as transitory and claimed it was being driven by a rebound in the global economy after the sharp slowdown in the first half of 2020. While global central bank policy remained highly accommodative, in Q2 we saw some central banks react to rising price pressures. Most notably, the Fed brought forward its expectations for rate hikes by a year to 2023.

Energy saw the largest gains at the sector level due to longs in crude oil and distillates. Crude oil prices hit a 2-year high on continued OPEC+ supply restrictions and an improving global demand outlook. Smaller gains were recorded from longs in natural gas and carbon emissions, with Trendfollowing, Short-term and Value recording notable gains in the sector.

Equities was another positive sector. Trendfollowing saw the majority of gains in the sector from holding long positions, with indices in the US and Europe hitting record highs boosted by strong earnings data. Longs in base metals resulted in further gains, as copper prices also hit a record high during Q2 2021.

Strong trends were seen in many agricultural contracts during Q2, with Trendfollowing and Value both recording notable gains. Longs in corn and soybean were the largest contributors to positive performance as the price of both contracts hit multi-year highs on strong Chinese demand and adverse weather in US and Brazilian growing regions.

On the downside, bonds were the largest detractor from Fund returns. Global bond yields rose in Q1 2021 on concerns about higher inflation and an improving outlook for the global economy. This resulted in losses for the Fund's long positions. The Fund then transitioned to short positions and saw further losses as trends reversed and bonds rallied in Q2 2021. Trendfollowing, Value and Global Macro were all negative in bonds, although Short-term managers did profit from the higher volatility in bond markets in Q1 2021.

The Fund was also negative in currencies. Having initially seen gains from long USD positions in Q1 2021, the Fund saw losses in Q2 2021 as the US currency reversed as US Treasury yields fell and the yield differential between the USD and its major counterparts narrowed.

Precious metals was another difficult sector, as price action was influenced by the trend reversals in the USD and in bonds during the period. This proved difficult for Trendfollowing managers, although Value was also negative due to relative value trading between gold and silver.

Past results are not indicative of future results. Investing in managed futures is not suitable for all investors given the level of risk involved, including the risk of loss.

For the period ended June 30, 2021

# **Investment Manager's Report (continued)**

#### Fund Performance to date (continued)

During the period we removed one Trendfollowing manager from the ACL Alternative Fund, with no managers added.

The ACL Alternative Fund continued to target a risk allocation to Trendfollowing strategies of 50-60% of portfolio risk through the year, with the balance allocated to diversifying non-trend strategies. We continued to target allocations to managers at 21% annualised volatility.

Since inception in January 2007, the ACMMF USD A has delivered total cumulative returns of +50.06%, versus +309.07% for the S&P 500 Total Return Index, +51.23% for the SG CTA Index and +43.09% for the Barclay BTOP 50 Index<sup>(3)</sup> over the same time period.

#### Abbey Capital Limited - Investment Manager

Abbey Capital entered its twenty-first year of track record in 2021.

The first six months of 2021 was a period of strong economic growth as activity continued to rebound from the pandemic-related slowdown of 2020. This contributed to strong trends in commodities and equities on which many managed futures strategies were able to capitalise. This period of stronger economic growth also coincided with a notable rise in inflation. The potential impact of higher inflation on the return prospects for traditional assets like bonds and equities was a key focus for many investors. While global monetary policy is expected to remain extremely accommodative in the near term, we did see some central banks take steps to scale back the level of monetary policy support in the first half of 2021, with more expected to follow suit in the coming quarters.

Given this backdrop, we continue to believe in the importance of holding diversifying strategies<sup>(4)</sup>. While we cannot control when and where profitable trends and opportunities may arise, we continue to maintain a conviction in the merit of managed futures as an investment strategy and this is reflected in our own investment portfolios.

**Abbey Capital Limited** 

September 2021

<sup>(3)</sup> Abbey Capital Multi Manager Fund Limited ("ACMMF") USD A Share Class commenced trading in January 2007 and invests solely in the ACL Alternative Fund USD Share Class A. All returns are net of fees and include interest. The above data is shown for illustrative purposes. The ACMMF is not benchmarked against any of the indices referenced. None of the funds managed by Abbey Capital Limited are benchmarked against any index. The SG CTA Index and Barclay BTOP 50 Index are derived from data which is self-reported by investment managers based on the performance of privately managed funds. In contrast the S&P 500 is an index comprising of publicly traded shares. As a result, these indices may not be directly comparable and the above is shown for illustrative purposes only. Please note that due to different fee structures within the ACMMF share classes, different share classes will have different returns. Some ACMMF share classes may have generated a lower return than the ACMMF A USD Share Class. Past results are not indicative of future results. Trading in managed futures is not suitable for all investors given its speculative nature and the high level of risk involved including the risk of total loss of initial investment. ACL Alternative Fund's appointed managers have been classified in accordance with the Trading Style that best describes each of their primary trading strategies as determined by Abbey Capital Limited.

<sup>(4)</sup> Diversification does not assure profit, nor does it protect against a loss (including in a declining market).

For the period ended June 30, 2021

# **Statement of Assets & Liabilities**

	As at June 30, 2021 US\$
Assets	023
Investment in ACL Alternative Fund (Note 3) Cash and cash equivalents (Note 11) Equalization credits and depreciation deposits receivable Redemption receivable from ACL Alternative Fund (Note 2) Prepaid expenses	184,098,544 897,606 2,562 832,000 33,571
Total assets	185,864,283
Liabilities	
Sundry payables and accrued expenses (Note 7) Subscriptions received in advance Redemptions payable (Note 2)	377,687 635,000 549,515
Total liabilities	1,562,202
Net assets	184,302,081
Paid-in capital (Note 6) Distributable earnings	214,840,726 (30,538,645)
Net assets	184,302,081
Shares in issue – USD A Share Class Shares in issue – USD B Share Class Shares in issue – USD C Share Class Shares in issue – USD D Share Class Shares in issue – USD E Share Class	908,998 19,735 177,266 212,748 4,570
Net Asset Value per share – USD A Share Class Net Asset Value per share – USD B Share Class Net Asset Value per share – USD C Share Class Net Asset Value per share – USD D Share Class Net Asset Value per share – USD E Share Class	\$150.06 \$140.64 \$104.29 \$122.69 \$117.28

These interim unaudited financial statements were approved by the Board of Directors and signed on their behalf by:

Director

Date: October 14, 2021

For the period ended June 30, 2021

# **Statement of Operations**

	For the period January 1 to June 30, 2021 US\$
Investment income	
Interest income	281
Fund expenses	
Administration fees (Note 4) Registrar and Transfer Agency fees (Note 4) Audit & tax fees Distribution fees (Note 4) Directors fees Corporate, legal & other fees Total expenses	(6,000) (20,000) (59,754) (1,548,795) (2,500) (36,813) (1,673,862)
Net investment loss	(1,673,581)
Net realized gain on Investments in ACL Alternative Fund (Note 9)	2,353,047
Net change in unrealized gain on Investments in ACL Alternative Fund (Note 9)	15,484,543
Net gain from investments in ACL Alternative Fund	17,837,590
Net increase in net assets resulting from operations	16,164,009

These interim unaudited financial statements were approved by the Board of Directors and signed on their behalf by:

Director

Date: October 14, 2021

For the period ended June 30, 2021

# **Statement of Changes in Net Assets**

	June 30 2021 US\$
Operations Net investment loss for the period	(1,673,581)
Net realized gain from Investments in ACL Alternative Fund (Note 9)	2,353,047
Net change in unrealized gain on Investments in ACL Alternative Fund (Note 9)	15,484,543
Net increase in net assets resulting from operations	16,164,009
Capital share transactions	
Issuance of shares (Note 6)	3,139,870
Redemption of shares (Note 6)	(12,622,829)
Net decrease in net assets resulting from capital share transactions	(9,482,959)
Net increase in net assets	6,681,050
Net assets: Beginning of the period	177,621,031
End of period	184,302,081

For the period ended June 30, 2021

# **Financial Highlights**

The following table includes selected data for the five sub-classes outstanding throughout the period and other performance information derived from the financial statements. The per share amounts which are shown reflect the income and expenses of the Fund.

	USD A Share Class	USD B Share Class	USD C Share Class	USD D Share Class	USD E Share Class
Net investment loss Net realized & unrealized	(1.31)	(1.36)	(0.93)	(1.21)	(1.11)
gain on investments	13.94	14.48	9.87	12.85	11.82
Net increase in					
net asset value per share(1)	12.63	13.12	8.94	11.64	10.71
Net asset value per share: Beginning of the period End of period	\$137.43 \$150.06	\$127.52 \$140.64	\$95.35 \$104.29	\$111.05 \$122.69	\$106.57 \$117.28
Total investment return	9.19%	10.29%	9.38%	10.48%	10.05%
Ratio of expenses to average net assets	(1.07%)	(0.07%)	(1.07%)	(0.07%)	(0.45%)
Ratio of net investment loss to average net assets	(1.07%)	(0.07%)	(1.07%)	(0.07%)	(0.45%)
Net assets at end of period	136,401,171	2,775,515	18,487,946	26,101,452	535,997

<sup>(1)</sup> Calculated based on average shares outstanding during the period.

#### Notes to the Financial Statements

#### 1. The Fund and its activities

The Abbey Capital Multi-Manager Fund Limited (the "Fund") was incorporated on October 4, 2006 under the laws of Bermuda as an open-ended investment fund with variable capital and limited liability. The Fund has created one Share Class, namely the USD Share Class, which is divided into a number of sub-classes. The sub-classes are the USD A Share Class, USD B Share Class, the USD C Share Class, the USD D Share Class and the USD E Share Class. All sub-classes offer investors monthly dealing. The Directors have the power to issue further Share Classes in different currencies in the future. The Fund is a feeder fund to the ACL Alternative Fund as it invests substantially all of its assets into the ACL Alternative Fund. The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited, a segregated accounts company incorporated as an open-ended investment company with limited liability under the laws of Bermuda. The NAV for the Fund's USD A Share Class is listed on the Bermuda Stock Exchange. As at June 30, 2021 the Fund owns 11.88% of the ACL Alternative Fund.

The interim unaudited financial statements of the ACL Alternative Fund, including the Condensed Schedule of Investments, are attached to these interim unaudited financial statements and should be read in conjunction with the Fund's financial statements.

The investment objective of the Fund is to seek long-term capital appreciation for its shareholders within a rigorous risk management framework. The Fund aims to achieve this objective through its direct investment in the ACL Alternative Fund.

#### 2. Significant accounting policies

These financial statements are presented using US Dollar (USD or US\$) as the functional currency and are prepared in conformity with accounting principles generally accepted in the United States of America ("US GAAP").

The Fund is considered an Investment Company under US GAAP and follows the accounting and reporting guidance applicable to investment companies in the Financial Accounting Standards Board ("FASB") Accounting Standards Codification ("ASC") 946, Financial Services – Investment Companies ("ASC 946"). The significant policies adopted by the Fund are as follows;

#### **Estimates and assumptions**

The preparation of financial statements in conformity with US GAAP requires management to make estimates and assumptions that affect the amounts and disclosures in the financial statements and accompanying notes. Actual amounts could differ from these estimates.

#### Investment income and expenses

Investment income and expenses are recognized in the Statement of Operations on an accruals basis.

#### Valuation of investments

The Fund records its investment in the ACL Alternative Fund at fair value. The fair value of the Fund's investment in the ACL Alternative Fund is the Net Asset Value per share as reported by the Administrator of the ACL Alternative Fund. The valuation of investments held by the ACL Alternative Fund is discussed in the notes to the ACL Alternative Fund interim unaudited financial statements which are attached to these financial statements.

#### 2. Significant accounting policies (continued)

#### Foreign currency

Other assets and liabilities denominated in foreign currencies are translated into USD amounts at the date of valuation. Income and expense items denominated in foreign currencies are translated into USD amounts on the respective dates of such transactions.

#### Redemptions payable

In accordance with FASB ASC Subtopic 480-10, Distinguishing Liabilities from Equity, a request for redemption of shares by an investor is considered a mandatory redeemable financial investment and shall be classified as a liability. Accordingly, requests for redemptions amounting to \$549,515 which were effective for July 1, 2021 have been reclassified to redemptions payable on the Statement of Assets and Liabilities. The Fund has sufficient liquid assets available to ensure full payment of these redemption amounts.

#### 3. Fair value measurements

The Fund's financial assets and liabilities carried at fair value have been classified for disclosure purposes, based on a hierarchy defined by FASB ASC 820, Fair Value Measurement.

The hierarchy gives the highest ranking to fair values determined using unadjusted quoted prices in active markets for identical assets and liabilities (Level 1) and the lowest ranking to fair values determined using methodologies and models with unobservable inputs (Level 3). The three levels of the fair value hierarchy under ASC 820 are described below:

- Level 1 Valuations based on unadjusted quoted prices in active markets for identical assets or liabilities that the Fund has the ability to access;
- Level 2 Valuations based on inputs, other than quoted prices included in Level 1, that are observable either directly or indirectly; and
- Level 3 Valuations based on inputs that are unobservable and significant to the overall fair value measurement.

As required by ASC 820, assets and liabilities are classified in their entirety based on the lowest level of input that is significant to the fair value measurement.

The Fund records its investment in the ACL Alternative Fund based on its proportionate share of the net assets of the ACL Alternative Fund using NAV as a practical expedient and is therefore not categorized within the fair value hierarchy. Valuation of investments held by the ACL Alternative Fund, including but not limited to, the valuation techniques used and categorization within the fair value hierarchy of investments are discussed in the notes to the ACL Alternative Fund financial statements.

All investments held by the ACL Alternative Fund as of June 30, 2021 fall within Level 1 or Level 2 of the fair value hierarchy.

#### 4. Fees and Expenses

#### Registrar and Transfer Agent, Administrator and Secretarial Services

The Fund pays US\$1,000 per month to the Administrator for the calculation of the Net Asset Value. These fees accrue daily and are paid monthly in arrears. The Fund pays US\$3,333 per month to the Registrar and Transfer Agent.

The Fund pays the Corporate Secretary and Bermuda Registrar an annual fee of US\$7,500 for corporate administration services.

The Fund is responsible for out of pocket expenses incurred by the Administrator, the Registrar and Transfer Agent, the Corporate Secretary and Bermuda Registrar for the benefit of the Fund. As a shareholder of ACL Alternative Fund, the Fund is required to pay its pro-rata share of the various fees and expenses of ACL Alternative Fund including brokerage commissions, administrative expenses, audit, legal, etc.

#### **Fund Distributors**

The Fund Distributors may receive a placement fee of up to 2% on all sales of the Shares. Each subscriber is informed of the placement fee attributable to such subscriber's Shares prior to committing to acquiring such Shares. Placement fees are paid in addition to the subscription amount. In addition, the Fund may pay the Fund Distributors an ongoing Distribution Fee equal to 2% of the average month-end Net Asset Value of the Fund for USD A Share Class and the USD C Share Class and 0.75% of the average month-end Net Asset Value of the Fund for USD E Share Class, accrued and payable monthly in arrears. Distribution fees for the period ending June 30, 2021 were US\$1,548,795 of which US\$264,732 were payable by the Fund for the period ending June 30, 2021. There are no Distribution Fees in the USD B Share Class or USD D Share Class.

#### **Investment Manager's Fee**

There are no investment management fees or incentive fees at the Fund level, but as a Shareholder of ACL Alternative Fund, the Fund will pay its pro-rata share of the management and incentive fees arising from the Fund's investment in the ACL Alternative Fund. Refer to the interim unaudited financial statements of the ACL Alternative Fund for further information on fees and expenses arising at the ACL Alternative Fund level. The Investment Manager will not receive any additional fees for acting as investment manager to the Fund or ACL Alternative Fund.

#### **Depositary fees**

In accordance with the obligations under the Alternative Investment Fund Managers Directive, ("AIFMD"), the Investment Manager and the Directors of the Fund appointed a depositary, BNP Paribas Securities Services, Dublin Branch (the "Depositary"), to provide the depositary services of cash monitoring, safe-keeping and oversight. The Depositary is responsible for overseeing the calculation of the value of the Shares of the Fund and ensuring that the value of the Shares of the Fund is calculated in accordance with the Fund's Private Placement Memorandum, the Company's Bye Laws, and Article 19 of AIFMD and is responsible for reporting any breach to the Central Bank of Ireland. There are no Depositary fees at the Fund level, but as a Shareholder of ACL Alternative Fund, the Fund will pay its pro-rata share of the Depositary fees arising from the Fund's investment in the ACL Alternative Fund.

#### 5. Taxation

At the present time, no income, profit or capital gains taxes are levied in Bermuda and, accordingly, no provision for such taxes has been recorded by the Fund.

The Fund has applied for, and obtained from, the Minister of Finance of Bermuda under the Exempted Undertakings Tax Protection Act 1966 an assurance that, in the event of there being enacted in Bermuda any legislation imposing tax computed on profits or income, or computed on any capital assets, gains or appreciation of any tax or nature of estate duty or inheritance tax, such tax shall not until March 31, 2035 be applicable to the Fund or to any persons not ordinarily resident in Bermuda and holding such Shares, debentures or other obligations of the Fund.

As an exempted mutual fund company, the Fund is liable to pay in Bermuda an annual government registration fee, at a current rate of US\$2,095 per annum, based upon the Fund's authorized share capital.

#### 6. Share Capital

The capital of the Fund is divided into 100 Founder Shares and such number of classes of Shares as the Directors may from time to time determine with the rights and restrictions contained in the Bye-laws as outlined in the Placement Memorandum.

- (a) Voting Rights: On a show of hands every Shareholder who is present in person or by proxy shall have one vote and every Founder Shareholder who is present, in person or by proxy, shall have one vote in respect of all of the Founder Shares. On a poll, every Shareholder present in person or by proxy shall be entitled to one vote in respect of each share held by him, and every Founder Shareholder who is present in person or by proxy, shall be entitled to one vote in respect of all of the Founder Shares.
- (b) Dividends: Shareholders shall be entitled to such dividends as the Directors may from time to time declare. The Founder Shareholders shall not be entitled to any dividends in respect of such Founder Shares.
- (c) Redemption: Shares may be redeemed by Shareholders on any Dealing Day in accordance with the Bye-laws.
- (d) Winding Up: If the Directors decide that it is in the best interests of Shareholders to wind up the Fund, the Secretary shall forthwith at the Directors' request, convene a special general meeting of the Fund to consider a proposal to appoint a liquidator to wind up the Fund. The liquidator, on appointment, shall firstly apply the assets of the Fund in satisfaction of creditors' claims as he or she deems appropriate. The assets of the Fund shall then be distributed amongst the Shareholders. The assets available for distribution amongst the Shareholders shall be applied as per the procedure outlined in the Bye-laws.

# **Notes to the Financial Statements (continued)**

# 6. Share Capital (continued)

Transactions in Shares for the period ending June 30, 2021 were as follows:

USD A Share Class	No. of Shares	Total US\$
Balance at December 31, 2020	956,994	173,685,815
Shares issued in the period Shares redeemed in the period	16,156 (60,924)	2,386,000 (8,692,690)
Balance at June 30, 2021	912,226	167,379,125
Shares redeemed on July 1, 2021	(3,228)	(484,331)
Balance at June 30, 2021 (in accordance with ASC Subtopic 480-10)	908,998	166,894,794
USD B Share Class	No. of Shares	Total US\$
Balance at December 31, 2020	21,755	3,387,458
Shares issued in the period Shares redeemed in the period	(2,020)	- (274,534)
Balance at June 30, 2021	19,735	3,112,924
Shares redeemed on July 1, 2021	-	-
Balance at June 30, 2021 (in accordance with ASC Subtopic 480-10)	19,735	3,112,924
USD C Share Class	No. of Shares	Total US\$
Balance at December 31, 2020	197,699	23,345,533
Shares issued in the period Shares redeemed in the period	(20,433)	(2,030,544)
Balance at June 30, 2021	177,266	21,314,989
Shares redeemed on July 1, 2021	-	-
Balance at June 30, 2021 (in accordance with ASC Subtopic 480-10)	177,266	21,314,989

June 30, 2021

## Notes to the Financial Statements (continued)

## 6. Share Capital (continued)

USD D Share Class	No. of Shares	Total US\$
Balance at December 31, 2020	216,038	23,457,879
Shares issued in the period Shares redeemed in the period	6,203 (8,962)	753,870 (1,075,546)
Balance at June 30, 2021	213,279	23,136,203
Shares redeemed on July 1, 2021	(531)	(65,184)
Balance at June 30, 2021 (in accordance with ASC Subtopic 480-10)	212,748	23,071,019
USD E Share Class	No. of Shares	Total US\$
USD E Share Class Balance at December 31, 2020	<b>No. of Shares</b> 4,570	<b>Total US\$</b> 447,000
Balance at December 31, 2020 Shares issued in the period		
Balance at December 31, 2020  Shares issued in the period  Shares redeemed in the period	4,570 - -	447,000 - -

## 7. Sundry payables and accrued expenses

	US\$
Distribution fees	264.732
Audit & tax fees	107,054
Registrar and Transfer Agency fees	3,333
Administration fees	1,000
Corporate, Legal & Misc	1,568
Total Sundry payables and accrued expenses	377,687

#### 8. Financial Instruments

The main risks arising from the Fund's financial instruments are as follows:

#### **Investment in ACL Alternative Fund**

The Fund is subject to the risks associated with the ACL Alternative Fund's investments and may also be adversely impacted by the activities of other shareholders in the ACL Alternative Fund. The risks arising from the ACL Alternative Fund's investments are set out in the notes to the ACL Alternative Fund's financial statements.

#### 8. Financial Instruments (continued)

#### Market risk

Market risk represents the potential loss that can be caused by a change in the market value of the financial instruments. The Fund's exposure to market risk results from its direct investment in the ACL Alternative Fund and is therefore indirectly determined by a number of factors including interest rates, foreign currency exchange and market volatility arising from the ACL Alternative Fund's investments in the Trading Funds. Investments by the ACL Alternative Fund, through its investments into the Trading Funds, may be made in markets located in countries which are exposed to the risks of political change or years of political uncertainty which could adversely affect the market value of the investments held by the ACL Alternative Fund.

The ACL Alternative Fund, through its investments into the Trading Funds, may invest in securities or derivatives which are unlisted or for which there is no active market.

For example, the Trading Funds may invest in derivatives with direct or indirect exposure to emerging markets and such investments may be subject to increased political risk or adverse currency movements compared to securities traded in more developed markets. In addition, the Trading Funds may acquire investments which are only traded over-the-counter. Accurately valuing and realizing such investments, or closing out positions in such investments at appropriate prices, may not always be possible.

#### **Operational Risk**

Pursuant to Investment Manager's Risk Management Policy, risks throughout the Investment Manager are identified, measured, assessed and monitored in the Risk Register. This system identifies factors that could cause risk, including operational risk, measures to reduce risk and any required solutions. It is reviewed on an ongoing basis by the respective business units and the Risk Management Unit. Reviews are completed by staff in consultation with the Risk Management Unit. The Risk Register is reviewed and approved annually by the Board of Directors of the Investment Manager.

#### Leverage

Under AIFMD, the Investment Manager is required to express the level which the Fund's leverage will not exceed, as a ratio between the Fund's total exposure and its Net Asset Value. AIFMD prescribes two methodologies for calculating overall exposure of a fund: the "gross methodology" and the "commitment methodology". These methodologies are briefly summarised below but are set out in full detail in AIFMD.

The commitment methodology takes account of the hedging and netting arrangements employed by a fund at any given time (purchased and sold derivative positions will be netted where both relate strictly to the same underlying asset). By contrast, the gross methodology does not take account of the netting or hedging arrangements employed by a fund.

Based on the methodologies for calculating global exposure outlined above, the Fund's maximum expected level of leverage is one time the Net Asset Value of the Fund using the Gross method. The Fund's maximum expected level of leverage is also one time the Net Asset Value of the Fund using the Commitment method.

For the period ended June 30, 2021

## Notes to the Financial Statements (continued)

#### 8. Financial Instruments (continued)

#### Liquidity risk

In order to ensure that cash is available for the Fund to meet redemption requests, the Investment Manager has established and maintains risk management policies and systems which are designed to ensure that the Fund maintains a level of liquidity appropriate to its underlying obligations. The liquidity of the Fund is subject to the risks associated with the ACL Alternative Fund's investments and may also be adversely impacted by the activities of other shareholders in the ACL Alternative Fund. The liquidity risks arising from the ACL Alternative Fund's investments and the management of these risks by the Investment Manager are set out in the notes to the ACL Alternative Fund's financial statements.

#### 9. Gains and losses from financial instruments

The following table details the gains and losses from financial assets and liabilities:

	June 30, 2021
	US\$
Realized gains on Investments	2,353,047
Net change in unrealized gain on investments	15,484,543
Total gain on investments	17,837,590

Gains and losses presented above exclude the Fund's interest income and interest expense.

#### 10. Related party disclosures

The Fund considers the Investment Manager, its principal owners, members of management, members of their immediate families and entities under common control to be related parties to the Fund. Amounts due from and due to related parties are generally settled in the normal course of business.

The Fund is a feeder fund that invests substantially all of its assets into the ACL Alternative Fund. The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited.

The Directors of the Fund are entitled to remuneration as agreed by the Directors and shall be deemed to accrue from day to day. Total Directors Fees accrued for the period to June 30, 2021 were US\$2,500. Mr. Carney does not receive a Director's fee. All other related party transactions have been fully disclosed in the financial statements, including investment in affiliated funds.

#### 11. Cash and cash equivalents

Amounts held with BNP Paribas Securities Services, Dublin Branch as at June 30, 2021 amounted to US\$897,606. BNP Paribas Securities Services, Dublin Branch is rated by the following credit agencies: S&P A-1, Moody P-1 and Fitch F1.

#### 12. Accounting for uncertainty in income taxes

Accounting Standards Codification ("ASC") 740-10 "Accounting for Uncertainty in Income Taxes – an interpretation of ASC 740" clarifies the accounting for uncertainty in income taxes recognized in the Fund's financial statements in conformity with ASC 740 "Accounting for Income Taxes". ASC 740-10 prescribes a recognition threshold and measurement attribute for the financial statement recognition and measurement of a tax position or expected position to be taken on a tax return. Given the Fund's domicile, the investment objective of the Fund and the strategy, the Directors of the Fund have determined there are no uncertain tax positions. In addition, the Fund is not subject to any tax examinations by the tax authorities in its country of domicile or taxing authorities in other jurisdictions.

#### 13. Historic Net Asset Values per share (NAV) and Funds under Management (FUM)

Share Class		Dec 31, 2019	Dec 31, 2020	Jun 30, 2021
USD A Share Class USD B Share Class USD C Share Class USD D Share Class USD E Share Class	NAV NAV NAV NAV	\$130.35 \$118.57 \$90.49 \$103.28 \$99.87	\$137.43 \$127.52 \$95.35 \$111.05 \$106.57	\$150.06 \$140.64 \$104.29 \$122.69 \$117.28
Share Class		Dec 31, 2019	Dec 31, 2020	Jun 30, 2021
USD A Share Class USD B Share Class USD C Share Class USD D Share Class USD E Share Class	FUM FUM FUM FUM FUM	\$144,971,343 \$2,922,524 \$22,928,800 \$19,139,083 \$322,341	\$131,516,210 \$2,774,213 \$18,851,561 \$23,992,024 \$487,023	\$136,401,171 \$2,775,515 \$18,487,946 \$26,101,452 \$535,997

#### 14. Subsequent events

Events subsequent to June 30, 2021 have been evaluated up to October 14, 2021, the date these interim unaudited financial statements were available to be issued.

No material subsequent events have occurred since June 30, 2021 that would require recognition or disclosure in these interim unaudited financial statements.

#### 15. Approval of interim unaudited Financial Statements

These interim unaudited financial statements were approved by the Board of Directors on October 14, 2021.

# ACL Alternative Fund A segregated account of ACL Alternative Fund SAC Limited Interim unaudited Financial Statements for the period

Abbey Capital Limited is an Alternative Investment Fund Manager, regulated by the Central Bank of Ireland. Abbey Capital Limited is the Commodity Pool Operator of ACL Alternative Fund SAC Limited and operates it as an exempt pool pursuant to sub-section 4.7 of the Regulations issued pursuant to the Commodity Exchange Act, as amended. Abbey Capital Limited is a member of the National Futures Association ("NFA"), and is registered as an Investment Advisor with the Securities Exchange Commission ("SEC"). None of the regulators listed above endorse, indemnify, or guarantee the member's business practices, selling methods, the class or type of securities offered, or any specific security.

NFA ID: P046201

January 1, 2021 to June 30, 2021

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A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## Directory

# Registered Office of ACL Alternative Fund SAC Limited: Victoria Place, 31 Victoria Street, Hamilton HM 10, Bermuda

#### **Directors**

Peter Carney (Non-Executive Director) James Keyes (Independent Non-Executive Director) Nicholas Hoskins (Independent Non-Executive Director)

#### **Auditor**

KPMG 1 Harbourmaster Place IFSC Dublin 1 Ireland

#### Legal Adviser

Conyers Dill & Pearman Clarendon House 2 Church Street Hamilton HM 11 Bermuda

#### Corporate Secretary & Bermuda Registrar

M.Q. Services Limited Victoria Place 31 Victoria Street Hamilton HM 10 Bermuda

#### **Investment Manager**

Abbey Capital Limited 1-2 Cavendish Row Dublin 1 Ireland

#### **Listing Sponsor**

McCann FitzGerald Listing Services Limited Riverside One Sir John Rogerson's Quay Dublin 2 Ireland

## Administrator, Registrar & Transfer Agent

BNP Paribas Bank & Trust Cayman Limited Buckingham Square 3<sup>rd</sup> Floor 720 West Bay Road Grand Cayman, KY1-1104 Cayman Islands

#### **Depositary**

BNP Paribas Securities Services, Dublin Branch Trinity Point 10-11 Leinster Street South Dublin 2 Ireland

# **Investment Manager's Report**

#### Legal Structure

The ACL Alternative Fund (the "Fund") is a segregated account of ACL Alternative Fund SAC Limited (the "Company"). The ACL Alternative Fund (USD Share Class A) commenced as a program in December 2000 and was incorporated as an open-ended investment company in Bermuda on January 4, 2002. The Company registered as a Segregated Accounts Company on May 18, 2009 following its restructure under the Segregated Account Companies Act 2000 of Bermuda, as amended (the "Act").

The Company has created five share classes, namely the USD Share Class, the GBP Hedged Share Class, the EUR Hedged Share Class, the CHF Hedged Share Class and the Yen Hedged Share Class, each of which is subdivided into a number of sub-classes of which fifteen are currently in issue (see table below for details). The Directors have the power to issue further share classes in different currencies in the future.

		NAV per share as of
Share Classes in Issue	Launch Date	June 30, 2021
USD Share Class A	January 31, 2002	\$367.40
USD Share Class B	July 3, 2006	\$212.89
USD Share Class C	January 2, 2009	\$122.50
USD Share Class E	April 1, 2014	\$150.29
Euro Hedged Share Class A	July 1, 2004	EUR237.90
Euro Hedged Share Class B	July 1, 2009	EUR131.96
Euro Hedged Share Class C	January 29, 2010	EUR119.04
GBP Hedged Share Class A	June 1, 2010	£139.43
GBP Hedged Share Class B	January 30, 2006	£224.84
GBP Hedged Share Class C	February 4, 2011	£111.33
CHF Hedged Share Class A	April 15, 2011	CHF100.74
CHF Hedged Share Class B	March 1, 2010	CHF124.07
CHF Hedged Share Class C	October 15, 2010	CHF99.13
JPY Hedged Share Class B	January 21, 2011	¥11,680
JPY Hedged Share Class D	August 31, 2010	¥11,820

The Fund has four feeder funds. The ACL Global Fund (a sub-fund of ACL Fund SICAV Plc) invests in excess of 40% of its assets in the Fund. Abbey Capital Multi-Manager Fund Limited, the Abbey Capital ACL Alternative Fund (a sub-fund of ACL Fund SICAV Plc), and Abbey Capital Daily Futures Fund Limited, invest the majority of their assets into the Fund.

#### **Investment Objective and Strategy**

The investment objective of the Fund is to seek long-term capital appreciation for its shareholders.

The Fund allocated to 19 trading funds (the "Trading Funds") as at June 30, 2021, each Trading Fund being a separate and distinct segregated account established and maintained by the Company. Through its shareholdings in the Trading Funds, the Fund operates as a multi-manager fund. The trading advisors of the Trading Funds (the "Trading Advisors") are given a power of attorney to trade on behalf of a Trading Fund through a managed account in the Trading Fund's name held with one of the Trading Fund's principal brokers.

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## **Investment Manager's Report (continued)**

#### **Investment Objective and Strategy (continued)**

Diversification is achieved at the Trading Fund, trading style and market sector level<sup>(4)</sup>. The Fund, through its allocation of assets to the Trading Funds, has exposure to a range of trading styles, including Long-term Trendfollowing ("Trendfollowing"), Short-term Systematic ("Short-term"), Value and Global Macro. Market exposure is broadly diversified with positions in global currency, financial and commodity markets. The Trading Advisors for the Trading Funds are selected on the basis of a variety of quantitative and qualitative criteria, including:

- long-term positive returns on capital invested;
- favorable risk-adjusted performance measures;
- favorable inter-Trading Advisor correlations to provide diversification benefits between Trading Advisors<sup>(4)</sup>; and
- · proven track record and risk management capability.

Attention is also paid to the correlation between each Trading Advisor's returns and the returns on equities. Ideally Trading Advisors that have displayed a tendency to have a negative correlation with equities when equities are declining are preferred. This has resulted in the Fund's low long-term correlation with equity markets.

#### **Fund Performance to date**

The Fund's USD Share Class A returned +11.49% in the first six months of 2021. Since inception in December 2000 the Fund (USD Share Class A) has returned cumulatively +339.25%, providing an annualised return for the USD Share Class A of +7.45%.

The first six months of 2021 were generally positive for managed futures, with strong trends seen in equity and commodity markets. Within the Fund, Trendfollowing drove positive performance over the six-month period. The non-trendfollowing trading styles were positive in aggregate, as gains from Short-term and Value outweighed losses from Global Macro.

Risk assets enjoyed a positive start to 2021. The reflation theme was a key focus for investors, as improving global economic data, the re-opening of the global economy and the prospect of increased fiscal spending in the US all contributed to a strong rally in equities and growth-sensitive commodities like energy and base metals.

Higher inflation expectations were another focus for investors, with the US 10-year inflation breakeven rate rising above 2.5% for the first time since 2013 in May. Survey-based data also showed signs of building price pressures in various industries and in May US CPI showed an annual increase of 5.0%, the largest increase since 2008. Forecasts of higher inflation acted as a tailwind for commodity prices, with many contracts hitting multi-year highs during the period.

Some central banks, including the Federal Reserve ("Fed"), dismissed the higher inflation as transitory and claimed it was being driven by a rebound in the global economy after the sharp slowdown in the first half of 2020. While global central bank policy remained highly accommodative, in Q2 we saw some central banks react to rising price pressures. Most notably, the Fed brought forward its expectations for rate hikes by a year to 2023.

<sup>(1)</sup> The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited. The ACL Alternative Fund (USD Share Class A) commenced as a program in December 2000 and was incorporated as a Fund in January 2002. Return figures shown are net of fees and include interest (pro forma interest is included from December 2000 - April 2001, actual interest thereafter). Please note that due to different fee structures within the ACL Alternative Fund, different share classes will have different returns. Some ACL Alternative Fund share classes may have generated a lower return than the ACL Alternative Fund USD Share Class A. Past results are not indicative of future results. Investing in managed futures is not suitable for all investors given the level of risk involved, including the risk of loss.

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## **Investment Manager's Report (continued)**

#### Fund Performance to date (continued)

Energy saw the largest gains at the sector level due to longs in crude oil and distillates. Crude oil prices hit a 2-year high on continued OPEC+ supply restrictions and an improving global demand outlook. Smaller gains were recorded from longs in natural gas and carbon emissions, with Trendfollowing, Short-term and Value recording notable gains in the sector.

Equities was another positive sector. Trendfollowing saw the majority of gains in the sector from holding long positions, with indices in the US and Europe hitting record highs boosted by strong earnings data. Longs in base metals resulted in further gains, as copper prices also hit a record high during Q2 2021.

Strong trends were seen in many agricultural contracts during Q2, with Trendfollowing and Value both recording notable gains. Longs in corn and soybean were the largest contributors to positive performance as the price of both contracts hit multi-year highs on strong Chinese demand and adverse weather in US and Brazilian growing regions.

On the downside, bonds were the largest detractor from Fund returns. Global bond yields rose in Q1 2021 on concerns about higher inflation and an improving outlook for the global economy. This resulted in losses for the Fund's long positions. The Fund then transitioned to short positions and saw further losses as trends reversed and bonds rallied in Q2 2021. Trendfollowing, Value and Global Macro were all negative in bonds, although Short-term managers did profit from the higher volatility in bond markets in Q1 2021.

The Fund was also negative in currencies. Having initially seen gains from long USD positions in Q1 2021, the Fund saw losses in Q2 2021 as the US currency reversed as US Treasury yields fell and the yield differential between the USD and its major counterparts narrowed.

Precious metals was another difficult sector, as price action was influenced by the trend reversals in the USD and in bonds during the period. This proved difficult for Trendfollowing managers, although Value was also negative due to relative value trading between gold and silver.

The Fund's USD Share Class A has delivered total cumulative returns of  $+339.25\%^{(2)}$  since inception, versus +389.10% for the S&P 500 Total Return Index and +144.14% for the SG CTA Index<sup>(3)</sup> over the same time frame.

During the period we removed one Trendfollowing manager from the Fund, with no managers added.

The Fund continued to target a risk allocation to Trendfollowing strategies of 50-60% of portfolio risk through the year, with the balance allocated to diversifying non-trend strategies<sup>(4)</sup>. We continued to target allocations to managers at 21% annualised volatility.

(2) The ACL Alternative Fund is a segregated account of ACL Alternative Fund SAC Limited. The ACL Alternative Fund (USD Share Class A) commenced as a program in December 2000 and was incorporated as a Fund in January 2002. Return figures shown are net of fees and include interest (pro forma interest is included from December 2000 - April 2001, actual interest thereafter). Please note that due to different fee structures within the ACL Alternative Fund, different share classes will have different returns. Some ACL Alternative Fund share classes may have generated a lower return than the ACL Alternative Fund USD Share Class A. Past results are not indicative of future results. Investing in managed futures is not suitable for all investors given the level of risk involved, including the risk of loss. ACL Alternative Fund's appointed managers have been classified in accordance with the Trading Style that best describes each of their primary trading strategies as determined by Abbey Capital Limited.

<sup>(3)</sup>The above is shown for illustrative purposes only. None of the funds managed by Abbey Capital Limited are benchmarked against any index. The SG CTA Index is derived from data which is self-reported by investment managers based on the performance of privately managed funds. In contrast the S&P 500 is an index comprising of publicly traded shares. As a result, these indices may not be directly comparable and the above is shown for illustrative purposes only. Trading in managed futures is not suitable for all investors given its speculative nature and the high level of risk involved including the risk of total loss of initial investment.

<sup>&</sup>lt;sup>(4)</sup>Diversification does not assure profit, nor does it protect against a loss (including in a declining market).

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

# **Investment Manager's Report (continued)**

#### **Abbey Capital Limited - Investment Manager**

Abbey Capital entered its twenty-first year of track record in 2021.

The first six months of 2021 was a period of strong economic growth as activity continued to rebound from the pandemic-related slowdown of 2020. This contributed to strong trends in commodities and equities on which many managed futures strategies were able to capitalise. This period of stronger economic growth also coincided with a notable rise in inflation. The potential impact of higher inflation on the return prospects for traditional assets like bonds and equities was a key focus for many investors. While global monetary policy is expected to remain extremely accommodative in the near term, we did see some central banks take steps to scale back the level of monetary policy support in the first half of 2021, with more expected to follow suit in the coming quarters.

Given this backdrop, we continue to believe in the importance of holding diversifying strategies<sup>(4)</sup>. While we cannot control when and where profitable trends and opportunities may arise, we continue to maintain a conviction in the merit of managed futures as an investment strategy and this is reflected in our own investment portfolios.

**Abbey Capital Limited** 

September 2021

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

# **Condensed Schedule of Investments**

Condensed Schedule of Investments			
			% of Net
			Asset
Short Term Deposits		Fair Value US\$	Value
HSBC Bank Plc, July 1, 2021, 0.06%		115,664,965	7.46%
Mizuho Bank Limited, July 1, 2021, 0.10%		114,893,393	7.41%
DNB Bank ASA, July 1, 2021, 0.06%		114,885,445	7.41%
Rabobank, July 1, 2021, 0.05%		114,451,288	7.38%
Skandinaviska Enskilda Banken, July 1, 2021, 0.33%		112,501,614	7.26%
DZ Bank, July 1, 2021, 0.06%		111,304,906	7.18%
Swedbank AB, July 1, 2021, 0.07%		102,286,513	6.60%
National Bank of Canada, July 1, 2021, 0.06%		101,758,284	6.56%
Bank of Montreal, July 1, 2021, 0.07%		100,104,025	6.46%
Sumitomo Mitsui Trust Bank, July 1, 2021, 0.01%		46,479,047	3.00%
ABN AMRO, July 1, 2021, 0.04%		30,544,468	1.97%
BNP Paribas, July 1, 2021, 0.03%		2,268,718	0.15%
Total Short Term Deposits		2,200,710	0.13/0
(cost: US\$1,067,104,668)		1,067,142,666	68.84%
			% of Net
	No. of		Asset
Purchased Future Option Contracts	contracts	Fair Value US\$	Value
Various Currency Futures Contracts (Aug-Sep21)	532	212,611	0.01%
Various Equity Index Futures Contracts (Jul21)	672	537,759	0.03%
Various Interest Rate Futures Contracts (Sep21-Mar22)	8.975	594,769	0.03%
	1,966	260,799	0.04%
Various Financial Futures Contracts (Jul-Aug21)	1,966	260,799	0.02%
Total Purchased Future Option Contracts	12,145	1,605,918	0.10%
(cost: US\$2,693,876)			o/ <b>5.1</b> 1 -
			% of Net
	No. of	- 1 1/1 1/24	Asset
Sold Future Option Contracts	contracts	Fair Value US\$	Value
Various Currency Futures Contracts (Aug-Sep21)	(532)	(618,731)	(0.04%)
Various Interest Rate Futures Contracts (Dec21-Mar22)	(7,480)	(68,463)	(0.00%)
Various Financial Futures Contracts (Jul-Aug21)	(1,966)	(454,828)	(0.03%)
Total Sold Future Option Contracts	(9,978)	(1,142,022)	(0.07%)
(cost: (US\$1,668,708))			
			% of Net
	No. of		Asset
Investments in Long Futures Contracts	contracts	Fair Value US\$	Value
Various Currency Futures Contracts (Jul-Sep21)	7,817	(9,737,716)	(0.63%)
Various Energy Futures Contracts (Jul21-May23)	9,099	27,748,944	1.79%
Various Grains Futures Contracts (Jul21-Dec22)	6,814	5,397,319	0.35%
Various Equity Index Futures Contracts (Jul21-Dec24)	10,875	2,065,866	0.13%
Various Interest Rate Futures Contracts (Sep21-Jun23)	17,313	(1,216,215)	(0.08%)
Various Financial Futures Contracts (Sep21)	20,862	2,462,812	0.16%
Various Meat Futures Contracts (Aug21-Feb22)	989	(2,079,080)	(0.13%)
Various Metal Futures Contracts (Jul21-Jun22)	5,822	701,951	0.04%
Various Industrial Futures Contracts (Jul-Nov21)	33	(18,335)	(0.00%)
Various Tropical Futures Contracts (Dec21-May22)	676	(166,126)	(0.01%)
Tatal Lang Futures Contracts	90.300	25 150 420	1.630/
Total Long Futures Contracts	80,300	25,159,420	1.62%

# **Condensed Schedule of Investments (continued)**

Investment in Short Futures Contracts	No. of contracts	Fair Value US\$	% of Net Asset Value
Various Currency Futures Contracts (Jul-Sep21) Various Energy Futures Contracts (Jul-Sep21)	(6,779) (1,272)	8,061,844 (2,152,488)	0.52% (0.14%)
Various Grains Futures Contracts (Jul21-Dec22)	(3,381)	(3,345,248)	(0.14%)
Various Equity Index Futures Contracts (Jul-Sep21)	(5,064)	(1,031,344)	(0.07%)
Various Interest Rate Futures Contracts (Jul21-Jun24)	(40,762)	1,050,651	0.07%
Various Financial Futures Contracts (Sep21) Various Meat Futures Contracts (Aug-Dec21)	(16,712) (345)	(8,834,344) 128,213	(0.57%) 0.01%
Various Metal Futures Contracts (Aug Dec21)  Various Metal Futures Contracts (Jul21-Apr22)	(3,175)	(3,764,703)	(0.24%)
Various Industrial Futures Contracts (Jul-Nov21)	(9)	8,337	0.00%
Various Tropical Futures Contracts (Dec21)	(219)	104,340	0.01%
Total Short Futures Contracts	(77,718)	(9,774,742)	(0.63%)
			% of Net
Investments in Long Interest Rate Swap Contracts			Asset
Various Interest Data Super Contracts		Fair Value US\$	Value
Various Interest Rate Swap Contracts		(9,809,553)	(0.63%)
Total Long Interest Rate Swap Contracts		(9,809,553)	(0.63%)
			% of Net
Investments in Short Interest Rate Swap Contacts			Asset
Various Interest Data Swan Contrasts		Fair Value US\$	Value
Various Interest Rate Swap Contracts		10,583,049	0.68%
Total Short Interest Rate Swap Contracts		10,583,049	0.68%
Investments in Long Forward Foreign Exchange Contracts			% of Net Asset
Various Forward Foreign Exchange Contracts		Fair Value US\$	Value
various Forward Foreign Exchange Contracts		(28,277,052)	(1.82%)
Total Long Forward Foreign Exchange Contracts		(28,277,052)	(1.82%)
Investments in Short Forward Foreign Exchange			% of Net
Contacts			Asset
		Fair Value US\$	Value
Various Forward Foreign Exchange Contracts		24,653,223	1.59%
Total Short Forward Foreign Exchange Contracts		24,653,223	1.59%
Net unrealized gains on Futures, Options, Swap and Forward Contracts		12,998,241	0.84%
Other Net Assets and Liabilities		470,011,918	30.32%
Net assets		1,550,152,825	100.00%

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

# **Statement of Assets and Liabilities**

Assets Fund	June 30, 2021 US\$
Investments in short term deposits (Note 3) Cash and cash equivalents Due from broker	494,138,891 13,805,068 9,723,327
Trading Funds Investments in short term deposits (Note 3) Derivative & foreign exchange contracts, at fair value (Note 3,7) Cash and cash equivalents Due from broker	573,003,775 111,912,414 73,478,140 388,087,204
Total Assets	1,664,148,819
Liabilities Fund Derivative & foreign exchange contracts, at fair value (Note 3,7) Depreciation deposits / Equalization credits (Note 4) Redemptions payable (Note 2)	3,627,815 2,547,195 2,267,769
Trading Funds Derivative & foreign exchange contracts, at fair value (Note 3,7) Fees payable (Note 4)	95,286,358 10,266,857
Total Liabilities	113,995,994
Net Assets	1,550,152,825
Analysis of Net Assets Paid-in capital (Note 6) Distributable earnings Net Assets	1,141,495,995 408,656,830 1,550,152,825

# Statement of Assets and Liabilities (continued)

NAV per Share	Shares in issue
\$367.40	3,045,484
\$212.89	1,037,197
\$122.50	23,611
\$150.29	404,454
EUR237.90	279,431
EUR131.96	48,489
EUR119.04	1,051
£139.43	37,889
£224.84	4,528
£111.33	2,005
CHF100.74	847
CHF124.07	42,920
CHF99.13	922
¥11,680	295,033
¥11,820	134,455
	\$367.40 \$212.89 \$122.50 \$150.29 EUR237.90 EUR131.96 EUR119.04 £139.43 £224.84 £111.33 CHF100.74 CHF124.07 CHF99.13 ¥11,680

Director

Date: October 14, 2021

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

# **Statement of Operations**

	For the period January 1 to June 30, 2021 US\$
Investment income	
Fund Interest income (Note 2)	325,138
Trading Funds Interest income (Note 2)	154,548
Total Investment income	479.686
Expenses	
Trading Funds Investment manager management fees (Note 4) Trading advisors' management fees (Note 4) Investment manager incentive fees (Note 4) Trading advisors' incentive fees (Note 4) Administration fees (Note 4) Depositary fees (Note 4) Audit & Tax fees (Note 4) Legal & other professional fees (Note 4) Registrar & transfer agent fees (Note 4) Directors' fees (Note 4)	(6,314,510) (3,577,759) (7,206,316) (13,581,002) (656,305) (119,531) (101,253) (83,158) (75,000) (7,545)
Total expenses	(31,722,379)
Net investment loss	(31,242,693)
Net realized gain/(loss) on: Investments in derivative and foreign exchange contracts of the Fund (Note 9) Investments in derivative and foreign exchange contracts of the Trading Funds (Note 9)	(2,345,281) 236,094,343
Net change in unrealized loss on: Investments in derivative and foreign exchange contracts of the Fund (Note 9) Investments in derivative and foreign exchange contracts of the Trading Funds (Note 9)	(4,435,261) (60,699,811)
Net gain from investments in	
derivative and foreign exchange contracts	168,613,990
Net increase in net assets resulting from operations	137,371,297

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

# **Statement of Operations (continued)**

These interim unaudited Financial Statements were approved by the Board of Directors and signed on their behalf by

Director

Date. October 14, 2021

End of period

A segregated account of ACL Alternative Fund SAC Limited	June 30, 2021
Statement of Changes in Net Assets	June 30, 2021 US\$
Operations Net investment loss for the period	(31,242,693)
Net realized gain from Investments in derivative and foreign exchange contracts	233,749,062
Net change in unrealized loss on Investments in derivative and foreign exchange contracts	(65,135,072)
Net increase in net assets resulting from operations	137,371,297
Capital share transactions Proceeds on issue of shares (Note 6) Paid on redemption of shares (Note 6) Depreciation deposits applied (Note 4)	105,525,719 (90,006,859) 14,075,828
Net increase in net assets resulting from capital share transactions	29,594,688
Net increase in net assets	166,965,985
Net Assets Beginning of the period	1,383,186,840

1,550,152,825

# **Financial Highlights**

period in USD

The following tables include selected data for each Share Class outstanding at each month end throughout the period and other performance information derived from the Financial Statements. The per share amounts which are shown reflect the income and expenses of the Fund.

Share Class	USD Share Class A	USD Share Class B	USD Share Class C	USD Share Class E	GBP Hedged Share Class A
Currency	USD	USD	USD	USD	GBP
Net investment loss	(8.71)	(5.47)	(3.00)	(3.65)	(2.69)
Net realized & unrealized gain on investments  Net increase in	46.56	27.09	15.53	19.04	17.20
Net Hicrease III  Net Asset Value per Share*	37.85	21.62	12.53	15.39	14.51
Net Asset Value per share: Beginning of period End of period	329.55 367.40	191.27 212.89	109.97 122.50	134.90 150.29	124.92 139.43
Total return before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees  Total net return	12.96% (0.55%) (0.92%) 11.49%	12.82% (0.60%) (0.92%) 11.30%	12.31% (0.00%) (0.92%) 11.39%	12.44% (0.11%) (0.92%) 11.41%	12.74% (0.21%) (0.92%) 11.61%
Expenses to average net assets before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees  Total net expenses**	(0.69%) (0.55%) (0.92%) <b>(2.16%)</b>	(0.81%) (0.60%) (0.92%) (2.33%)	(1.31%) (0.00%) (0.92%) (2.23%)	(1.19%) (0.11%) (0.92%) (2.22%)	(0.69%) (0.21%) (0.92%) (1.82%)
Net investment loss before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees Total net investment loss	(0.65%) (0.55%) (0.92%) (2.12%)	(0.78%) (0.60%) (0.92%) (2.30%)	(1.27%) (0.00%) (0.92%) (2.19%)	(1.15%) (0.11%) (0.92%) (2.18%)	(0.65%) (0.21%) (0.92%) (1.78%)
Net assets, end of					

<sup>\*</sup> Calculated based on the average number of shares outstanding during the period.

1,118,916,958

220,806,419 2,892,290

60,786,921

7,292,600

As set out in Note 4 to these Financial Statements, the Fund does not pay fees and expenses directly. All fees and expenses of the Fund are distributed to and paid by each Trading Fund based on the Fund's holding in each Trading Fund.

# **Financial Highlights (continued)**

	GBP Hedged Share	GBP Hedged Share	Euro Hedged Share	Euro Hedged Share	EUR Hedged Share
Share Class	Class B	Class C	Class A	Class B	Class C
Currency	GBP	GBP	EUR	EUR	EUR
Net investment loss	(4.49)	(2.67)	(3.87)	(2.32)	(2.73)
Net realized & unrealized gain on investments  Net increase in	27.82	13.83	27.91	15.55	14.13
Net increase in Net Asset Value per Share*	23.33	11.16	24.04	13.23	11.40
Net Asset Value per share: Beginning of period End of period	201.51 224.84	100.17 111.33	213.86 237.90	118.73 131.96	107.64 119.04
Total return before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees Total net return	12.64% (0.14%) (0.92%) 11.58%	12.06% (0.00%) (0.92%) 11.14%	12.16% (0.00%) (0.92%) 11.24%	12.06% (0.00%) (0.92%) 11.14%	11.51% (0.00%) (0.92%) <b>10.59%</b>
Expenses to average net assets before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees  Total net expenses**	(0.81%) (0.14%) (0.92%) (1.87%)	(1.31%) (0.00%) (0.92%) <b>(2.23%)</b>	(0.69%) (0.00%) (0.92%) (1.61%)	(0.81%) (0.00%) (0.92%) (1.73%)	(1.31%) (0.00%) (0.92%) <b>(2.23%)</b>
Net investment loss before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees Total net investment loss	(0.78%) (0.14%) (0.92%) (1.84%)	(1.27%) (0.00%) (0.92%) <b>(2.19%)</b>	(0.65%) (0.00%) (0.92%) (1.57%)	(0.78%) (0.00%) (0.92%) (1.70%)	(1.27%) (0.00%) (0.92%) (2.19%)
Net assets, end of period in USD	1,405,141	308,076	78,754,422	7,580,203	148,179

<sup>\*</sup> Calculated based on the average number of shares outstanding during the period.

<sup>\*\*</sup> As set out in Note 4 to these Financial Statements, the Fund does not pay fees and expenses directly. All fees and expenses of the Fund are distributed to and paid by each Trading Fund based on the Fund's holding in each Trading Fund.

# **Financial Highlights (continued)**

	CHF Hedged Share	CHF Hedged Share	CHF Hedged Share	JPY Hedged Share	JPY Hedged Share
Share Class	Class A	Class B	Class C	Class B	Class D
Currency	CHF	CHF	CHF	JPY	JPY
Net investment loss	(1.63)	(2.17)	(2.25)	(216)	(252)
Net realized & unrealized gain on investments	11.77	14.53	11.67	1,445	1,470
Net increase in Net Asset Value per Share*	10.14	12.36	9.42	1,229	1,218
Net Asset Value per share: Beginning of period End of period	90.60 100.74	111.71 124.07	89.71 99.13	10,451 11,680	10,602 11,820
Total return before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees Total net return	12.12% (0.00%) (0.92%) 11.20%	11.98% (0.00%) (0.92%) <b>11.06%</b>	11.43% (0.00%) (0.92%) <b>10.51</b> %	12.69% (0.00%) (0.92%) 11.77%	12.41% (0.00%) (0.92%) 11.49%
Expenses to average net assets before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees  Total net expenses**	(0.69%) (0.00%) (0.92%) (1.61%)	(0.81%) (0.00%) (0.92%) (1.73%)	(1.31%) (0.00%) (0.92%) <b>(2.23%)</b>	(0.81%) (0.00%) (0.92%) (1.73%)	(1.06%) (0.00%) (0.92%) (1.98%)
Net investment loss before Trading Advisor incentive fees Investment Manager incentive fees Trading Advisor incentive fees Total net investment loss	(0.65%) (0.00%) (0.92%) (1.57%)	(0.78%) (0.00%) (0.92%) <b>(1.70%)</b>	(1.27%) (0.00%) (0.92%) <b>(2.19%)</b>	(0.78%) (0.00%) (0.92%) (1.70%)	(1.03 %) (0.00%) (0.92%) (1.95%)
Net assets, end of period in USD	92,188	5,749,888	98,739	31,016,598	14,304,203

<sup>\*</sup> Calculated based on the average number of shares outstanding during the period.

As set out in Note 4 to these Financial Statements, the Fund does not pay fees and expenses directly. All fees and expenses of the Fund are distributed to and paid by each Trading Fund based on the Fund's holding in each Trading Fund.

## Notes to the Financial Statements

#### 1. The Fund and its activities

The ACL Alternative Fund (the "Fund") is a segregated account of ACL Alternative Fund SAC Limited (the "Company"). The Company is an open-ended investment fund, located in Bermuda with variable capital and limited liability. The Company was incorporated on January 4, 2002. The Company commenced operating as a Segregated Accounts Company on May 18, 2009 following its restructure under the Segregated Account Companies Act 2000 of Bermuda, as amended (the "Act"). As a result of this restructure, the Company created segregated accounts, including the Fund and the Trading Funds. As segregated accounts, the assets and liabilities of each segregated account are segregated, which means the assets of each segregated account only and will be protected from creditors of the Company or the Company's other segregated accounts<sup>(4)</sup>.

Investors may invest in the Fund directly or via one of the feeder funds, namely Abbey Capital Multi-Manager Fund Limited, Abbey Capital ACL Alternative Fund, Abbey Capital Daily Futures Fund Limited or ACL Global Fund. The investment objective of the Fund is to achieve long term capital appreciation for its Shareholders.

As at June 30, 2021 the Fund allocates in excess of 60% of its assets to 19 Trading Funds, each Trading Fund being a segregated account of the Company. Appointed Trading Advisors are given a power of attorney to trade on behalf of a Trading Fund through a managed account in the Trading Fund's name held with one of the Trading Fund's principal brokers. Through its allocation of assets to the Trading Funds, the Fund operates as a multi-advisor fund. As at June 30, 2021, the ACL Alternative Fund allocated to 19 underlying managers.

The Fund is one of five segregated accounts which are open to investors and which invest in the Trading Funds.

The Fund has created five Share Classes, a USD Share Class, a GBP Hedged Share Class, a Euro Hedged Share Class, a CHF Hedged Share Class and a Yen Hedged Share Class each of which is subdivided into a number of sub-classes of which fifteen are currently in issue; a USD Share Class A, a USD Share Class B, a USD Share Class C, a USD Share Class E, a Euro Hedged Share Class A, a Euro Hedged Share Class B, a Euro Hedged Share Class C, a GBP Hedged Share Class A, a GBP Hedged Share Class B, a GBP Hedged Share Class C, a CHF Hedged Share Class B, a CHF Hedged Share Class C, a JPY Hedged Share Class B and a JPY Hedged Share Class D. The USD Share Class D was fully redeemed on December 1, 2019. The USD Share Class A, Euro Hedged Share Class A and GBP Hedged Share Class A are listed on the Euronext Dublin Stock Exchange. The functional currency is the United States Dollar (USD).

Abbey Capital Limited has been appointed to act as Investment Manager of the Company and the Fund pursuant to the Investment Manager Agreement. Subject to the overall supervision of the Directors and to the Fund's investment objectives, policies and restrictions, the Investment Manager will have discretion to manage the investment and re-investment of the Fund's assets.

#### 2. Significant accounting policies

These financial statements are presented using the United States Dollar (USD or US\$) as the functional currency and are prepared in conformity with accounting principles generally accepted in the United States of America ("US GAAP"). The Fund is considered an Investment Company under US GAAP and follows the accounting and reporting guidance applicable to investment companies in the Financial Accounting Standards Board ("FASB") Accounting Standards Codification ("ASC") 946, Financial Services – Investment Companies ("ASC 946"). The significant policies adopted by the Fund are as follows;

<sup>&</sup>lt;sup>(4)</sup>The provisions of the Act have not yet been tested by a court.

## **ACL Alternative Fund**

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## **Notes to the Financial Statements (continued)**

## 2. Significant accounting policies

## **Estimates and assumptions**

The preparation of Financial Statements in conformity with US GAAP requires management to make estimates and assumptions that affect the amounts and disclosures in the Financial Statements and accompanying notes. Actual amounts could differ from these estimates.

## **Investments through Trading Funds**

The Fund's allocated share of the underlying investments of each Trading Fund are measured at fair value. The allocated share of the realised and change in unrealised gain/(loss) and expenses are included in the Statement of Operations.

## **Recognition of income**

Interest income is accounted for on an accrual basis and recognized in the Statement of Operations.

#### Valuation of investments

The value of any security traded on a stock exchange is valued at the last reported trade quoted on such exchange or, if not available, at the mean between the exchange quoted bid and ask prices at the close of business. This equates to fair value as it represents the amount at which the security could be exchanged in a current transaction between willing parties, other than in a forced or liquidation sale. The fair value of a liability is the amount at which that liability could be incurred or settled in a current transaction between willing parties, that is, other than in a forced or liquidation sale. Derivative instruments dealt on a market will be valued at the settlement price as of the date of valuation for such instruments on such markets as this equates to fair value.

In the event of no ready market value or counterparty quote being available, or if such valuation is not representative of the asset's fair market value, the Administrator is entitled to use other generally recognized valuation principles in order to reach a proper valuation of that specific asset. These valuation techniques may involve some level of management estimation and judgment which becomes significant with increasingly complex instruments or pricing models. Where appropriate, adjustments are included to reflect the risk inherent in a particular methodology, model or input used.

Investment transactions are accounted for on a trade date basis. Realized gains and losses on investments are determined on a first-in first-out basis, except for futures where opening trades undertaken on the same day are netted prior to the application of first-in, first-out.

#### Amounts due from broker

Amounts due from broker represent margin deposited with the broker to fund derivative trading.

#### Cash and cash equivalents

Cash, including cash denominated in foreign currencies, represents cash deposits held at financial institutions. Cash equivalents include short-term highly liquid investments of sufficient credit quality that are readily convertible to known amounts of cash and have original investments of three months or less. Cash equivalents are carried at cost, plus accrued interest, which approximates fair value.

Cash equivalents are held for meeting short-term liquidity requirements, rather than for investment purposes. Cash and cash equivalents are held at major financial institutions and are subject to counterparty risk as described in note 7.

## **ACL Alternative Fund**

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## Notes to the Financial Statements (continued)

## 2. Significant accounting policies (continued)

### Foreign currency

Investment securities and other assets and liabilities denominated in foreign currencies are translated into U.S. Dollar amounts at the date of valuation. Purchases and sales of investment securities and income and expense items denominated in foreign currencies are translated into U.S. Dollar amounts on the respective dates of such transactions. The Fund does not isolate that portion of the results of operations resulting from changes in foreign exchange rates on investments from the fluctuations arising from changes in market prices of securities held. Such fluctuations are included with the net realized and unrealized gain or loss from investments.

#### **Options purchased**

When an option is purchased, an amount equal to the premium paid is recorded as an investment and is subsequently adjusted to the current market value of the option purchased. Premiums paid for the purchase of options which expire unexercised are treated by the Fund on the expiration date as realized losses. If a purchased call option is exercised, the premium increases the cost basis of the security or foreign currency purchased by the Fund.

#### **Options sold**

When an option is sold, an amount equal to the premium received is recorded as an investment and is subsequently adjusted to the current market value of the option sold. Premiums received for the sale of options which expire unexercised are treated by the Fund on the expiration date as realized gains. If a sold call option is exercised, the premium received increases the Fund's effective sales price of the security or foreign currency sold.

#### **Short-term deposits**

Short-term deposits are stated at amortized cost, which approximates fair value.

#### Forward currency contracts

The unrealized gain or loss on open forward currency contracts is calculated by reference to the difference between the contracted rate and the rate to close out the contract. Realized gains or losses include amounts on contracts which have been settled or offset by other contracts with the same counterparty.

The unrealized gains and losses as a result of marking these contracts to market at June 30, 2021 are included in the Statement of Assets and Liabilities. The change in market value of forward exchange contracts is included in the Statement of Operations within the line "Net change in unrealized gain/(loss) on investments in derivative contracts and foreign currency".

#### **Futures contracts**

Initial margin deposits are made upon entering into futures contracts and are generally made in cash. During the period the futures contract is open, changes in the value of the contract are recognized as unrealized gains or losses by "marking-to-market" on a daily basis to reflect the market value of the contract at the end of each day's trading.

Unrealized gains and losses are disclosed on the Statement of Assets and Liabilities. When the contract is closed, the Fund records a realized gain or loss equal to the difference between the proceeds from (or cost of) the closing transaction and the Fund's basis in the contract.

#### **Interest Rate Swaps**

The Fund values interest rate swaps using a discounted cash flow model based on the terms of the contract (including the notional amount and contract maturity) and multiple inputs including where applicable, yield curves, prepayment rates and currency exchange rates.

## 2. Significant accounting policies (continued)

### **Brokerage commissions**

Brokerage commissions, including other trading expenses, are charged to realized and unrealized gains and losses as they are incurred to open a position, and an amount accrued for the close out of the position.

### Redemptions payable

In accordance with FASB ASC Subtopic 480-10, Distinguishing Liabilities from Equity, a request for a redemption of shares by an investor is considered a mandatory redeemable financial instrument and shall be classified as a liability. Accordingly, requests for redemptions amounting to US\$874,276 effective for July 1, 2021 have been reclassified to redemptions payable on the Statement of Assets and Liabilities. Further redemption amounts dealt in June 2021 totaling US\$1,393,493 remained payable to investors at period end.

#### 3. Fair value measurements

The Fund's financial assets and liabilities carried at fair value have been classified for disclosure purposes, based on a hierarchy defined by FASB ASC 820, Fair Value Measurement.

The hierarchy gives the highest ranking to fair values determined using unadjusted quoted prices in active markets for identical assets and liabilities (Level 1) and the lowest ranking to fair values determined using methodologies and models with unobservable inputs (Level 3). The three levels of the fair value hierarchy under ASC 820 are described below:

- Level 1—Valuations based on unadjusted quoted prices in active markets for identical assets or liabilities that the Fund has the ability to access.
- Level 2— Valuations based on inputs, other than quoted prices included in Level 1, that are observable either directly or indirectly.
- Level 3—Valuations based on inputs that are unobservable and significant to the overall fair value measurement

As required by ASC 820, assets and liabilities are classified in their entirety based on the lowest level of input that is significant to the fair value measurement. The table overleaf shows information about the Fund's assets and liabilities measured at fair value as of June 30, 2021. All values shown are stated in USD.

Assets	Level 1 US\$	Level 2 US\$	Level 3 US\$	June 30, 2021 Total US\$
Investments in short term deposits	1,067,142,666	-	-	1,067,142,666
Investments in derivative contracts Investments in	73,331,655	11,919,698	-	85,251,353
foreign exchange contracts	-	26,661,061	-	26,661,061
Total Assets	1,140,474,321	38,580,759	-	1,179,055,080

## 3. Fair value measurements (continued)

Liabilities	Level 1 US\$	Level 2 US\$	Level 3 US\$	Balance as at June 30, 2021 Total US\$
Investments in derivative contracts Investments in	(57,483,081)	(11,146,202)	-	(68,629,283)
foreign exchange contracts	-	(30,284,890)	-	(30,284,890)
<b>Total Liabilities</b>	(57,483,081)	(41,431,092)	-	(98,914,173)
Total	1,082,991,240	(2,850,333)	<u> </u>	1,080,140,907

There were no significant transfers between any of the levels of the fair value hierarchy during the period ended June 30, 2021. In addition, there were no Level 3 Assets or Liabilities held by the Fund as at June 30, 2021 or at any time during the period then ended.

## 4. Fees and expenses

There are no class specific expenses except where in the interests of seeking the optimal protection of a shareholder's investment, the Fund may engage in foreign exchange hedging transactions for the Euro Hedged Share Class A, the Euro Hedged Share Class B, the Euro Hedged Share Class C, the GBP Hedged Share Class A, the GBP Hedged Share Class B, the GBP Hedged Share Class C, the CHF Hedged Share Class B, the CHF Hedged Share Class B or the JPY Hedged Share Class D (where profits, gains and losses, costs, income and expenditure consequent upon such hedging transactions are allocated to that class).

#### Management and incentive fees

The Fund does not pay management or incentive fees directly to the Investment Manager. Management Fees are calculated at the Fund level and then allocated to and paid by each Trading Fund based on the Fund holdings in the Trading Funds at month end.

The Management Fees paid to the Investment Manager are charged at the following annual rates based on the Net Asset Value of the Fund on each Dealing Day of each month, payable weekly or monthly in arrears at a rate of 0.75% ("A" Sub Classes), 1.00% ("B" Sub Classes), 2.00% ("C" Sub Classes), 1.50% ("D" Sub Classes) and 1.75% ("E" Sub Classes) per annum of the Net Asset Value of the Fund.

The Investment Manager is also entitled to an incentive fee for each calendar quarter equal to 7.5% ("A" Sub Classes), 10% ("B" Sub Classes), 10% ("C" Sub Classes), 10% ("D" Sub Classes) and 10% ("E" Sub Classes) of the Net New Investment Profit (as defined below) for the quarter. "Net New Investment Profit" means, the increase in the Fund's Net Asset Value of the applicable share class outstanding in respect of each calendar quarter, prior to the deduction of the Investment Manager's incentive fee, and subject to a high water mark. No incentive fees were paid to the Investment Manager during the period.

## 4. Fees and expenses (continued)

#### Investment manager and trading advisor equalization

The incentive fee will be accrued and taken into account in the calculation of the Net Asset Value per Share on each Valuation Day. The incentive fee calculation in respect of the Fund is computed by operating an equalization accounting system so that each Share is charged an incentive fee that is based upon that Share's performance. This structure is intended to reduce the impact on existing Shareholders of incentive fees attributable to capital contributed or withdrawn during a performance year, and allows that all Shares within the same Share class have the same Net Asset Value per Share.

Where an investor subscribes for Shares at a time when the Net Asset Value per Share is less than the high water mark then an adjustment is required to reduce inequalities that may otherwise result to the respective subscriber, to the other Shareholders of the Fund, or to the Investment Manager or Trading Advisor. The high water mark is the greater of (i) the highest Net Asset Value per Share on the last day of any calendar quarter and (ii) the initial issue price for the Shares, both adjusted to take into account any distributions made in the interim.

Where Shares are subscribed at a time when the Net Asset Value per Share is less than the high water mark, no incentive fee will be accrued for existing Shareholders until the high water mark has been recovered. New Shareholders will however, in effect, be required to pay an incentive fee with respect to any subsequent appreciation in the Net Asset Value per Share of those Shares until the high water mark has been achieved (the "Depreciation Deposit"). The Depreciation Deposit is payable if the Net Asset Value per Share increases up to the high water mark. The Depreciation Deposit is recorded on the Statement of Assets and Liabilities as a liability. This liability is reduced when the related incentive fee is paid to the Investment Manager and Trading Advisors.

During the period ended June 30, 2021, amounts of US\$19,917,160 were crystallized from the Depreciation Deposit account of which US\$14,075,828 was paid to the fund and US\$5,841,332 was paid to the Investment Manager. As at June 30, 2021, the total amount of depreciation deposits payable to investors amounted to US\$2,545,161.

Where Shares ("Premium Shares") are purchased at a time when the Net Asset Value per Share is greater than the high water mark, the prospective investor is required to pay an additional sum equal to the accrual then in place per Share in respect of the incentive fee (an "equalization credit"). The equalization credit is designed to ensure that all Shareholders have the same amount of capital at risk per Share.

The equalization credit may be returned to the investor in the form of shares providing the Net Asset Value per share remains above the high watermark at the end of a subsequent performance guarter.

To the extent that the Net Asset Value per share declines below the offer price, so the proportionate reduction in the equalization credit is returned to the investor. The equalization credit is recorded on the Statement of Assets and Liabilities as a liability. This liability is reduced when shares are returned to the investor. As at June 30, 2021 the equalization credits payable to investors amounted to US\$2,034.

The Trading Funds will pay to the external Trading Advisors of the Company's other Segregated Accounts/Trading Funds an annual management fee based on the Trading Fund Equity before management fees and incentive fees payable monthly in arrears.

## 4. Fees and expenses (continued)

## Investment manager and trading advisor equalization (continued)

The Company may increase/decrease the amount of Trading Funds and allocations thereto at its discretion and without Shareholder approval. Fees will range among the Trading Advisors from a minimum of 0% to a maximum of 2% per annum of each Trading Advisor's allocated assets.

The Trading Funds will also pay to the Trading Advisors an incentive fee for each calendar month or quarter. Incentive Fees will range from 0% to a maximum of 25% of Net New Trading Advisor Profit (as defined below) for the month or quarter (the "Incentive Fee"). "Net New Trading Advisor Profit" means, with respect to any calendar month or quarter, any net profits (or losses) realized on all transactions closed out in the Trading Fund during the month or quarter (after deduction of brokerage commissions, exchange fees, NFA fees and give-up fees), but prior to the deduction of any fees charged by the Investment Manager, Administrator or Depositary for services to the Fund, plus:

- (A) the change in net unrealized profits (or losses) on open positions in the Trading Fund as of the end of the quarter or preceding relevant calendar month versus the amount of such unrealized profits (or losses) on open positions in the Trading Fund as of the end of the preceding quarter or preceding relevant calendar month, minus
- (B) the Management Fees for the calendar quarter or relevant calendar month (but not including any Incentive Fee) and minus
- (C) any cumulative net realized and unrealized trading losses (including expenses) incurred in the Trading Fund since the last preceding calendar quarter or last preceding calendar month for which an Incentive Fee was payable. Trading Advisor management and incentive fees are not paid at the Fund level but by the individual Trading Funds.

#### Administration, registrar fees and transfer agency fees

The aggregate fees payable by the Fund to the Administrator, Registrar and Transfer Agent are calculated based on the Fund's pro rata share of the Investment Managers' total assets under administration with the Administrator on each Valuation day.

The effective fee rate is calculated as 14bp p.a. of the Net Asset Value of up to US\$ 250 million, 12bp p.a. on the next US\$ 250 million, 10bp p.a. on the next US\$ 500 million, 8bp p.a. on the next US\$ 500 million, 6bp p.a. on the next US\$ 1.5 billion and 4bp p.a. thereafter. In addition, BNP Paribas Bank & Trust Cayman Limited receives US\$12,500 per month in relation to administration, registrar & transfer agency services.

These fees will accrue daily and will be paid monthly in arrears, by the Trading Funds. All of the fees specified in the foregoing paragraph above for administration, registrar and transfer agency services will be paid in aggregate by each Trading Fund from the account it maintains.

#### **Depositary fees**

In accordance with the obligations under the Alternative Investment Fund Managers Directive, ("AIFMD"), the Investment Manager and the Directors of the Fund have appointed BNP Paribas Securities Services, Dublin branch ("Depositary") as Depositary. The Depositary is responsible for overseeing the calculation of the value of the Shares of the Fund and ensuring that the value of the Shares of the Fund is calculated in accordance with the Fund's Placement Memorandum, the Company's Bye Laws, and Article 19 of AIFMD and is responsible for reporting any breach to the Central Bank of Ireland.

## 4. Fees and expenses (continued)

## **Depositary fees (continued)**

The fees payable by each Trading Fund to the Depositary in relation to Depositary services provided to the fund will be calculated as 1.75 bp p.a. of the Net Asset Value of the Fund, up to USD5.5 billion and 1.5 bp p.a. thereafter. These fees will accrue daily and will be paid monthly in arrears, by the Trading Funds. Depositary fees for the period were US\$119,531. As at June 30, 2021, the total Depositary fees payable were US\$34,328.

#### Director's fees

The Trading Funds shall pay the Directors such annual remuneration for acting as Directors of the Company as the Directors may from time to time agree, provided however that the annual remuneration of the Directors shall not, in the aggregate, exceed US\$20,000. Mr. Carney does not receive any Directors' fee. Such fees shall be paid semi-annually in arrears.

#### Fees payable

Fees payable by the Trading Funds as at June 30, 2021 were:

	US\$
Investment Manager incentive fees	4,104,975
Trading Advisor incentive fees	4,247,003
Investment Manager management fees	874,637
Trading Advisor management fees	607,665
Audit & Tax fees	83,093
Administration fees	104,328
Brokerage commissions and other fees	166,273
Depositary fees	34,328
Other professional fees	44,555
Total	10,266,857

#### 5. Taxation

At the present time, no income, profit or capital gains taxes are levied in Bermuda and, accordingly, no provision for such taxes has been recorded by the Fund. The Company has received from the Minister of Finance of Bermuda under the Exempted Undertakings Tax Protection Act 1966 an assurance that, in the event of there being enacted in Bermuda any legislation imposing tax computed on profits or income, or computed on any capital assets, gain or appreciation or any tax in the nature of estate duty or inheritance tax, the Company shall be exempt from all such taxes until March 31, 2035.

As an exempted mutual fund Company, the Company is liable to pay in Bermuda an annual government registration fee, at a current rate of US\$4,275 per annum, based upon the Company's authorized share capital of which the Fund pays its pro-rated share.

## 6. Share Capital

#### **Shares**

#### Authorized and issued:

100 Founder Shares of US\$0.01 each, having been issued for the purposes of incorporation or the Company.

#### Authorized and unissued:

100,000,000 redeemable shares of US\$0.001 par value, which are available for issue in classes, each with a designated currency of issue.

In ACL Alternative Fund, Five Share Classes were authorized as at June 30, 2021 each of which is subdivided into a number of Sub-classes namely: a USD Share Class A, a USD Share Class B, a USD Share Class C, a USD Share Class D, a USD Share Class E, a Euro Hedged Share Class A, a Euro Hedged Share Class B, a Euro Hedged Share Class B, a GBP Hedged Share Class A, a GBP Hedged Share Class B, a GBP Hedged Share Class D, a JPY Hedged Share Class A, a JPY Hedged Share Class C, a JPY Hedged Share Class D, a CHF Hedged Share Class A, a CHF Hedged Share Class B, a CHF Hedged Share Class C.

As at June 30, 2021, shares have been issued in fifteen sub classes, namely the USD Share Class A, USD Share Class B, USD Share Class C, USD Share Class E, Euro Hedged Share Class A, Euro Hedged Share Class B, Euro Hedged Share Class C, GBP Hedged Share Class A, GBP Hedged Share Class B, GBP Hedged Share Class C, CHF Hedged Share Class A, CHF Hedged Share Class B, CHF Hedged Share Class C, JPY Hedged Share Class B and the JPY Hedged Share Class D.

Each Share is entitled to a vote.

Redeemable shares are offered on each business day. Applications are subject to a sales charge of up to 3% (payable to the Fund and/or its placement agents). Fractional shares may be issued.

Applications and redemptions received by 5.00 pm Irish time (12.00 pm EST or 6.00 pm CET) are processed the following business day. The right to redeem will be temporarily suspended during any period when the calculation of the Net Asset Value is suspended.

Income, expenses, realized and unrealized gains are allocated between Classes based on their relative net assets (with the exception of Class specific income and expenses, in particular the gains or losses arising on the Euro Hedged Share Class A, Euro Hedged Share Class B, Euro Hedged Share Class C, GBP Hedged Share Class A, GBP Hedged Share Class B, GBP Hedged Share Class C, CHF Hedged Share Class A, CHF Hedged Share Class C, JPY Hedged Share Class B and the JPY Hedged Share Class D currency hedging transactions).

Each share shall be entitled to such dividends as the Directors may from time to time declare. Founder shares shall not be entitled to any dividends.

If the Directors decide that it is in the best interests of Shareholders to wind up the Company, the Secretary shall forthwith at the Director's request, convene a special general meeting of the Company to consider a proposal to appoint a liquidator to wind up the Company. The liquidator on appointment will firstly apply the assets of each Fund in satisfaction of creditors' claims of that Trading Fund as he deems appropriate. The assets of the Fund will then be distributed amongst the Shareholders of the Fund.

## 6. Share Capital (continued)

USD Share Class A	Number of Shares	Share Capital US\$	Share Premium US\$	Total US\$
Balance at December 31, 2020	3,027,775	3,028	534,000,211	534,003,239
Shares issued	149,678	150	52,720,478	52,720,628
Shares redeemed	(129,892)	(130)	(45,001,814)	(45,001,944)
Depreciation deposits applied	-	-	10,626,432	10,626,432
			-,, -	-,, -
Balance at June 30, 2021	3,047,561	3,048	552,345,307	552,348,355
Shares to redeem (Jul 1, 2021)	(2,077)	(2)	(762,998)	(763,000)
, ,	, , ,	, ,	, , ,	, , ,
Balance at June 30, 2021	3,045,484	3,046	551,582,309	551,585,355
	Number of	Share		
USD Share Class B	Shares	Capital	<b>Share Premium</b>	Total
		US\$	US\$	US\$
Balance at December 31, 2020	1,011,437	1,012	218,310,878	218,311,890
Shares issued	98,328	98	20,506,336	20,506,434
Shares redeemed	(72,244)	(72)	(14,688,898)	(14,688,970)
Depreciation deposits applied	-	-	2,054,590	2,054,590
Balance at June 30, 2021	1,037,521	1,038	226,182,906	226,183,944
Shares to redeem (Jul 1, 2021)	(324)	(1)	(68,999)	(69,000)
Balance at June 30, 2021	1,037,197	1,037	226,113,907	226,114,944
	Normala are a f	Charre		
USD Share Class C	Number of Shares	Share	Share Premium	Total
USD Silate Class C	Silaies	Capital US\$	US\$	US\$
Balance at December 31, 2020	27,475	28	12,354,040	12,354,068
Shares issued	27, <del>4</del> 75 -	-	12,334,040	12,334,006
Shares redeemed	(3,864)	(4)	(471,620)	(471,624)
Depreciation deposits applied	-	-	10,113	10,113
Balance at June 30, 2021	23,611	24	11,892,533	11,892,557
	Number of	Share		
USD Share Class E	Shares	Capital	Share Premium	Total
B B	204 722	US\$	US\$	US\$
Balance at December 31, 2020	394,588	395	52,240,891	52,241,286
Shares issued	37,710	38	5,521,537	5,521,575
Shares redeemed	(27,844)	(28)	(4,102,602)	(4,102,630)
Depreciation deposits applied	-	-	743,412	743,412

## 6. Share Capital (continued)

Euro Hedged Share Class A	Number of Shares	Share Capital	Share Premium US\$	Total US\$
Balance at December 31, 2020	233,115	US\$ 233	28,513,412	28,513,645
Shares issued	85,313	<b>233</b> 85	23,715,624	23,715,709
Shares redeemed	(38,847)	(38)	(11,349,103)	(11,349,141)
Depreciation deposits applied	(30,047)	(36)	365,022	365,022
Depreciation deposits applied	_	_	303,022	303,022
Balance at June 30, 2021	279,581	280	41,244,955	41,245,235
Shares to redeem (Jul 1, 2021)	(150)	(1)	(42,275)	(42,276)
Balance at June 30, 2021	279,431	279	41,202,680	41,202,959
balance at Julie 30, 2021	273,731	213	41,202,000	41,202,333
	Number of	Share		
Euro Hedged Share Class B	Shares	Capital	Share Premium	Total
		US\$	US\$	US\$
Balance at December 31, 2020	43,077	43	13,216,390	13,216,433
Shares issued	14,817	14	2,224,922	2,224,936
Shares redeemed	(9,405)	(9)	(1,394,699)	(1,394,708)
Depreciation deposits applied	-	-	47,786	47,786
Balance at June 30, 2021	48,489	48	14,094,399	14,094,447
	Number of	Share		
Euro Hedged Share Class C	Shares	Capital	<b>Share Premium</b>	Total
		US\$	US\$	US\$
Balance at December 31, 2020	1,051	1	10,615,409	10,615,410
Shares issued	, -	-	, , <u>-</u>	-
Shares redeemed	-	-	<u>-</u>	-
Depreciation deposits applied	-	-	-	-
Palance et lune 20, 2021				
Balance at June 30, 2021	1,051	1	10,615,409	10,615,410
	Number of	Share		
CHF Hedged Share Class A	Shares	Capital	<b>Share Premium</b>	Total
5		US\$	US\$	US\$
Balance at December 31, 2020	847	1	1,010,666	1,010,667
Shares issued	-	- -	- ,- : - ;- : -	-,,
Shares redeemed	-	_	-	_
Depreciation deposits applied	-	_	316	316
zepreciation deposits applied				
Balance at June 30, 2021	847	1	1,010,982	1,010,983

## 6. Share Capital (continued)

CHF Hedged Share Class B	Number of Shares	Share Capital US\$	Share Premium US\$	Total US\$
Balance at December 31, 2020	42,920	42	13,341,401	13,341,443
Shares issued	-	-	-	-
Shares redeemed	-	-	-	-
Depreciation deposits applied	-	-	28,955	28,955
Balance at June 30, 2021	42,920	42	13,370,356	13,370,398
	Number of	Share		
CHF Hedged Share Class C	Shares	Capital	<b>Share Premium</b>	Total
3		US\$	US\$	US\$
Balance at December 31, 2020	922	1	3,046,018	3,046,019
Shares issued	-	-	-	-
Shares redeemed	-	-	-	-
Depreciation deposits applied	-	-	-	-
Balance at June 30, 2021	922	1	3,046,018	3,046,019
	Number of	Share		
GBP Hedged Share Class A	Shares	Capital	<b>Share Premium</b>	Total
		US\$	US\$	US\$
Balance at December 31, 2020 Shares issued	40,405	40	38,338,315 -	38,338,355
Shares redeemed	(2,516)	(2)	(455,325)	(455,327)
Depreciation deposits applied	-	-	10,925	10,925
Balance at June 30, 2021	27.000	20	27 902 015	27.802.052
balance at June 30, 2021	37,889	38	37,893,915	37,893,953
	Number of	Share		
GBP Hedged Share Class B	Shares	Capital	<b>Share Premium</b>	Total
		US\$	US\$	US\$
Balance at December 31, 2020	1,808	2	6,663,073	6,663,075
Shares issued	2,720	3	836,434	836,437
Shares redeemed	-	-	-	-
Depreciation deposits applied	-	-	1,673	1,673
Balance at June 30, 2021	4,528	5	7,501,180	7,501,185

## 6. Share Capital (continued)

GBP Hedged Share Class C	Number of Shares	Share Capital	Share Premium	Total
		US\$	US\$	US\$
Balance at December 31, 2020 Shares issued	2,005	2	1,999,737	1,999,739
Shares redeemed	-	_	<u>-</u>	<u>-</u>
Depreciation deposits applied	-	-	-	-
Balance at June 30, 2021	2,005	2	1,999,737	1,999,739
	Number of	Share		
JPY Hedged Share Class B	Shares	Capital	Share Premium	Total
		US\$	US\$	US\$
Balance at December 31, 2020	395,515	395	68,724,818	68,725,213
Shares issued	-	-	-	-
Shares redeemed	(100,482)	(100)	(10,341,776)	(10,341,876)
Depreciation deposits applied	-	-	186,604	186,604
Balance at June 30, 2021	295,033	295	58,569,646	58,569,941
	Number of	Share		
JPY Hedged Share Class D	Shares	Capital	<b>Share Premium</b>	Total
		US\$	US\$	US\$
Balance at December 31, 2020	147,260	147	108,168,195	108,168,342
Shares issued	-	-	-	-
Shares redeemed	(12,805)	(13)	(1,326,350)	(1,326,363)
Depreciation deposits applied	-	-	-	-
Balance at June 30, 2021	134,455	134	106,841,845	106,841,979

As at June 30, 2021, 7.81% of the USD Share Class A Shares were held by ACL Global Fund, 12.32% of the USD Share Class A Shares were held by Abbey Capital Multi-Manager Fund Limited, 20.93% of the USD Share Class B Shares were held by Abbey Capital Multi-Manager Fund Limited, 4.31% of the USD Share Class A Shares were held by Abbey Capital Daily Futures Fund Limited, 0.07% of the USD Share Class B Shares were held by Abbey Capital Daily Futures Fund Limited and 74.19% of the USD Share Class E Shares were held by Abbey Capital Daily Futures Fund Limited.

The Abbey Capital ACL Alternative Fund held the following holdings in the Fund as at June 30, 2021; 3.73% of the USD Share Class A, 0.06% of the USD Share Class B, 13.55% of the Euro Hedged Share Class B, 6.88% of the EUR Hedged Share Class B, 9.02% of the GBP Hedged Share Class B, and 10.35% of the CHF Hedged Share Class B.

#### 7. Financial instruments

Asset allocation is determined by the Investment Manager who manages the distribution of assets to achieve the investment objectives. Divergence from target asset allocations and the composition of the portfolio is monitored by the Investment Manager. In instances where the portfolio has diverged from target asset allocations, the Investment Manager will rebalance to fall in line with the target asset allocations. The Investment Manager has developed a tiered investment risk management system incorporating both quantitative and qualitative risk measures to monitor and control the Fund's exposure and whether the Fund's investments are consistent with the Fund's investment objectives, policies and limits as set out in the Fund's constitutional documents and prospectus. This is achieved through the collation of information from the administrator and brokers on all trading, cash movements and subscriptions/redemptions, along with the risk limits and flags created by the Investment Committee, into the Investment Manager's proprietary risk system.

The risk systems produce the required information to enable the Investment Committee to manage risk exposures, make timely and informed decisions, and enable the Risk Management unit to monitor the performance of the Fund. A range of daily reports are produced and these are monitored on a daily basis.

The Red Flag system is a tiered warning system in which colour coded flags are raised when a variety of metrics (described below) move within 75%, 90%, or 100% of previous highs/lows or pre-set levels.

Margin & FX Exposure Limits are monitored daily and the general rule is that the relationship with a Trading Advisor would be terminated immediately if these limits were breached. Margin & FX Exposure Limits for each Trading Advisor are outlined in the relevant Trading Advisor Agreement for each Trading Advisor. This system is monitored on a daily basis and the Investment Committee are immediately notified by the Risk Management unit if any of the limits outlined in the Fund's constitutional and offering documents are breached, or other limits are breached.

Drawdown (a reduction in value relative to the previous highest valuation) is monitored daily and a relationship with a Trading Advisor would be immediately terminated if their Risk-Adjusted Drawdown Limit was breached.

Volatility for the Fund and for each Trading Advisor is monitored daily. Each Trading Advisor is assigned a target volatility by the Investment Committee. All changes in Trading Advisors' target volatility are at the discretion of the Investment Committee and can be based on both quantitative and qualitative analysis.

The main risks arising from the Trading Fund's financial instruments are as follows:

#### Market risk

Market risk represents the potential loss that can be caused by a change in the market value of the financial instruments. The Trading Funds' exposure to market risk is determined by a number of factors including interest rates, foreign currency exchange and market volatility. Investments may be made in markets located in countries which are exposed to the risks of political change or years of political uncertainty which could adversely affect the market value.

## 7. Financial instruments (continued)

### Counterparty risk

There is a risk that counterparties may not perform their obligations and that settlement of transactions may not occur. The U.S. Commodity Exchange Act, as amended (the "CEA"), requires a clearing broker to segregate all funds received from such broker's customers in respect of futures (but not forwards) transactions from such broker's proprietary funds. If any of the Trading Fund's commodity brokers were not to do so to the full extent required by law. or in the event of a substantial default by one or more of such broker's other customers, the assets of the Trading Fund might not be fully protected in the event of the bankruptcy of such broker. Furthermore, in the event of such a bankruptcy, the Trading Funds would be limited to recovering only a pro rata share of all available funds segregated on behalf of the affected commodity broker's combined customer accounts, even though certain property specifically traceable to the Trading Funds (for example, United States Treasury bills or cash deposited by the Trading Funds with such broker) was held by such broker. Commodity broker bankruptcies have occurred in which customers were not able to recover from the broker's estate the full amount of their funds on deposit with such broker and owing to them. The below table shows the short term credit rating of the Fund's counterparties as at June 30, 2021:

Counterparty	S&P	Moody	Fitch
Deposit Banks			
Bank of Montreal	A-1	P-1	F1
Mizuho Bank Limited	A-1	P-1	NA
BNP Paribas Securities Services, Dublin Branch	A-1	P-1	F1
DNB Bank ASA	A-1	P-1	NA
DZ Bank AG	A-1	P-1	F1
National Bank of Canada	A-1	P-1	F1
Sumitomo Mitsui Trust Bank Ltd	A-1	P-1	F1
ABN AMRO	A-1	P-1	F1
Rabobank, N.A.	A-1	P-1	F1
HSBC Bank Plc.	A-1	P-1	F1
Swedbank AB	A-1	P-1	F1
Skandinaviska Enskilda Banken	A-1	P-1	F1
FCM and Prime Broker			
Credit Suisse International	A-1	P-1	F1
Deutsche Bank	A-2	P-2	F2
JPMorgan Securities Limited	A-1	P-1	F1
SG Americas Securities, LLC	A-1	P-1	F1
Societe Generale International Limited	A-1	P-1	F1
Bank of America N.A.	A-1	P-1	F1
UBS A.G.	A-1	P-1	F1
Depositary and Custodian			
BNP Paribas Securities Services, Dublin Branch	A-1	P-1	F1
Bank of New York Mellon	A-1	P-1	F1

## 7. Financial instruments (continued)

## Counterparty risk (continued)

As at June 30, 2021, cash required to be held as margin with the brokers amounted to US\$226,152,936. The remaining cash held with the brokers is excess margin.

Commodity broker bankruptcies are not insured by any governmental agency, and investors would not have the benefit of any protection such as that afforded customers of bankrupt securities broker-dealers by the U.S. Securities Investors Protection Corporation. In respect of its forward trading, the Trading Funds will be subject to the risk of the inability or refusal to perform with respect to such contracts on the part of the principals or agents with or through which the Trading Funds trade. Any failure or refusal to discharge their contractual obligations by the counterparties with which the Trading Funds deal on the forward markets, whether due to insolvency, bankruptcy or other causes, could subject the Fund to substantial losses.

The Trading Funds will not be excused from performance under any forward contracts into which it has entered due to defaults under other forward contracts which in the Investment Manager's strategy were to have substantially "covered" the former. The Trading Funds deal in the forward markets only with major financial institution counterparties which the Investment Manager considers to be creditworthy. However, defaults have occurred in the forward markets, and the risk of such defaults cannot be eliminated from the Trading Funds' trading markets, whether due to insolvency, bankruptcy or other causes, could subject the Fund to substantial losses.

The Company, on behalf of the Trading Funds, enters into forward contracts with counterparties. Forward contracts are traded in unregulated markets between principals, and consequently the Trading Funds assume a credit risk on these contracts.

## Off balance sheet risk/derivative risk

An off balance sheet market risk exists when the maximum potential loss on a particular investment is greater than the value of such investment, as reflected on the Trading Funds' Statement of Assets and Liabilities. Off balance sheet risk exists, among other situations, when the collateral received by the Trading Funds from counterparties to an agreement with the Company on behalf of the Trading Funds proves to be insufficient to cover the Trading Funds' losses resulting from default by the counterparties of its obligation to perform under the agreement. Futures contracts and forward contracts expose the Trading Funds to a market risk equal to the value of the contracts purchased.

As at June 30, 2021, the volume of the Fund's derivative activities based on their notional amounts and number of contracts are as follows:

	Long exposure		Short exp	osure
Primary underlying risk	Notional amount US\$'000	No. of contracts	Notional amount US\$'000	No. of contracts
Foreign Exchange Price				
Forward contracts	894,625	242	858,454	242
Futures contracts	463,191	7,817	717,507	6,779
Option contracts*	-	532	-	532
Commodity price				
Futures contracts	1,296,449	23,423	522,911	8,401

## 7. Financial instruments (continued)

Off balance sheet risk/derivative risk (continued)

	Long exp	_	Short ex	
Primary underlying risk	Notional amount US\$'000	No. of contracts	Notional amount US\$'000	No. of contracts
Bond price				
Futures contracts	3,326,329	20,862	2,732,010	16,712
Option contracts	-	1,966	-	1,966
Interest rate price				
Futures contracts	5,076,858	17,313	11,073,337	40,762
Options contracts*	-	8,975	-	7,480
Swap contracts	799,034	203	990,310	203
Equity price				
Futures contracts	1,248,262	10,875	297,194	5,064
Options contracts*	-	672	-	-

<sup>\*</sup>The Fund's exposure to option contracts is stated based on a 0.5 Delta. The actual position will vary over time and a stated position may overestimate or underestimate the true Delta. For this reason, only the number of option contracts held has been provided.

The fair value of derivative contracts at June 30, 2021, categorized by primary underlying risk and the impact on the Statement of Changes for the period ended June 30, 2021, is as follows:

Primary underlying risk	Asset Derivatives Fair Value	Liability Derivatives Fair Value	Realized Gain / (Loss)	Change in Unrealized Gain /(Loss)
	US\$	US\$	US\$	US\$
Foreign exchange price				
Forward contracts	26,661,061	(30,284,890)	(1,143,586)	(6,002,582)
Futures contracts	9,833,401	(11,509,274)	(7,120,543)	(5,222,641)
Option contracts	212,611	(618,731)	(143,430)	(1,514,426)
Commodity price				
Futures contracts	46,922,353	(24,359,229)	183,070,330	(30,227,912)
Bond price	5 5 45 207	(11.016.010)	(12.270.206)	(7.572.252)
Futures contracts	5,545,387	(11,916,919)	(13,270,306)	(7,573,353)
Options contracts	260,779	(454,828)	(538,846)	(105,700)
Interest rate price				
Futures contracts	1,530,025	(1,695,589)	(5,784,683)	(1,386,391)
Option contracts	594,769	(68,462)	696,983	208,556
Swap contracts	11,919,698	(11,146,202)	(1,815,092)	(2,683,467)
Equity price				
Futures contracts	7,894,571	(6,860,049)	86,756,851	(11,157,797)
Options contracts	537,759	-	(6,958,616)	530,641
		(0.0.0.1.1.0.0.)		(22 - 22 - 22)
Total	111,912,414	(98,914,173)	233,749,062	(65,135,072)

#### 7. Financial instruments (continued)

#### Leverage

The Fund enters into derivative contracts on the basis of initial margin deposits or premiums which are equal to a small percentage of the full market value of those contracts. Therefore, the notional values of the contracts traded by the Fund significantly exceed the margin or premium paid for those contracts by the Fund and, as a result of investing in such margin-traded instruments, leverage is inherent to the Fund's investment strategy.

Under AIFMD, the Investment Manager is required to express the level which the Fund's leverage will not exceed, as a ratio between the Fund's total exposure and its Net Asset Value. AIFMD prescribes two methodologies for calculating overall exposure of a fund: the "gross methodology" and the "commitment methodology". These methodologies are briefly summarised below but are set out in full detail in AIFMD.

The commitment methodology takes account of the hedging and netting arrangements employed by a fund at any given time (purchased and sold derivative positions will be netted where both relate strictly to the same underlying asset). By contrast, the gross methodology does not take account of the netting or hedging arrangements employed by a fund.

Based on the methodologies for calculating global exposure outlined above, the Company's maximum expected level of leverage is 250 times the Net Asset Value of the Fund using the Gross method. The Company's maximum expected level of leverage is 150 times the Net Asset Value of the Fund using the Commitment method.

The diversification and risk adjustment of the components within the Fund are designed to create a diversified balance of risk within the portfolio across a number of dimensions. One of those dimensions is market sector – equities, long-term interest rates, short-term interest rates, foreign exchange and commodities. The balance of risk is managed by reference to volatility measurements and the relationship of volatility to leverage on a Gross or Commitment basis is a complex one.

For instance, one of the market sectors is short term interest rate futures. These have short duration, typically 3 months, which makes them significantly less sensitive to interest rate changes than longer term interest rate futures, ranging from 2 years to in excess of 30 years. In order to ensure that the Investment Strategy remains diversified and balanced, and that the short term interest rate positions have the possibility of making a meaningful contribution to performance, the notional amounts of the short term interest rate futures will be significantly larger on average, both relative to the notionals of any longer term interest rate positions, and in absolute terms. Therefore, the high leverage of the Fund on a Gross and Commitment basis is a function of the use of short term interest rate futures within the portfolio.

The Investment Strategy's approach is to construct the Fund's portfolio in a diversified manner. The Investment Manager assesses exposure within the Fund by using a variety of measures including margin-to-equity. The Fund has a maximum margin-to-equity limit of 40%.

The risk utilization in the program changes dynamically over time depending on what positions are taken by the Trading Advisors. The Investment Strategy adopts the principle of risk spreading through diversification because holding positions in a wide-range of markets reduces concentration risk and has been shown, over time, to decrease portfolio volatility versus a single contract strategy.

## 7. Financial instruments (continued)

#### Operational risk

Pursuant to the Investment Manager's Risk Management Policy, risks throughout the Investment Manager are identified, measured, assessed and monitored in the Risk Register. This system identifies factors that could cause risk, including operational risk, measures to reduce risk and any required solutions. It is reviewed on an ongoing basis by the respective business units and the Risk Management Unit. Reviews are completed by staff in consultation with the Risk Management Unit. The Risk Register is reviewed and approved annually by the Board of Directors of the Investment Manager.

#### Futures and options risk

The Investment Manager may engage in various portfolio strategies on behalf of the Trading Funds through the use of futures and options. Due to the nature of futures, cash to meet margin monies will be held by a broker in an omnibus client account segregated from the Clearing Brokers' own property, with whom the Trading Funds have an open position. The Fund may grant a security interest to a Clearing Broker over any cash placed with that Clearing Broker in order to secure its obligations to the Clearing Broker. The Fund may transfer ownership of the cash to the Clearing Broker where the Clearing Broker is required to transfer ownership of the cash to other third parties, such as banks, brokers exchanges or central clearing parties, in order to comply with client money rules or to effect a transaction for the Fund. Where ownership of the cash is passed by the Clearing Broker to a third party, the Fund will have no proprietary right to the cash and in the event of insolvency of that third party, the Clearing Broker would only have an unsecured claim on the Fund's behalf to an amount equal to the value of the cash placed with that third party. In these circumstances the Fund is exposed to the risk that any amount received by the Clearing Broker will not be sufficient to satisfy the Fund's claim. Whether ownership of the cash has been transferred or whether cash is held in an omnibus client account, in the event of insolvency or bankruptcy of the futures exchange, or large losses sustained in the broker's segregated accounts, there can be no guarantee that such monies will be returned to the Trading Funds. On execution of an option a Trading Fund may pay a premium to a counterparty.

In the event of the insolvency or bankruptcy of the counterparty, the option premium may be lost in addition to any unrealized gains where the contract is in the money. The risks inherent in the use of the above instruments include adverse changes in the value of such instruments, imperfect correlation between the price of the instruments and movements in the price of the underlying security, index or futures contract and the possible absence of a liquid secondary market for any particular instrument at any time.

#### Liquidity and valuation of investments

In order to ensure that cash is available for the Fund to meet redemption requests, the Investment Manager has established and maintains risk management policies and systems which are designed to ensure that (i) the Fund maintains a level of liquidity appropriate to its underlying obligations; (ii) the Investment Manager monitors the liquidity profile of the Fund's portfolio of assets; (iii) the Investment Manager implements and maintains appropriate liquidity management systems, to assess the quantitative and qualitative risks of positions and of intended investments; (iv) the Investment Manager conducts periodic stress tests, under both normal and exceptional liquidity conditions, to assess and monitor the liquidity risk of the Fund.

#### 7. Financial instruments (continued)

### Liquidity and valuation of investments (continued)

Therefore, the Investment Manager's risk management policies and systems are designed to ensure that the liquidity risk of the Fund is monitored and managed and that the liquidity profile of the investments of the Fund complies with the Fund's liquidity obligations.

The Trading Funds may invest in securities or derivatives which are unlisted or for which there is no active market. For example, a Trading Fund may invest in derivatives with direct or indirect exposure to emerging markets and such investments may be subject to increased political risk or adverse currency movements compared to securities traded in more developed markets. In addition, a Trading Fund may acquire investments which are only traded over-the-counter. Accurately valuing and realizing such investments, or closing out positions in such investments at appropriate prices, may not always be possible.

#### Foreign currency risk

The Net Asset Value per Share will be computed in the Functional Currency, whereas the investments of Trading Funds, to which the Fund allocates its assets, may be acquired in a wide range of currencies, some of which may be affected by currency movements of a more volatile nature than those of developed countries and some of which may not be freely convertible.

It may not be possible or practicable to hedge against the consequent currency risk exposure and in certain instances the Investment Manager may consider it desirable not to hedge against such risk. The Investment Manager may enter into cross currency hedging transactions. As at June 30, 2021 US\$26,842,361 of cash was held in foreign currency with the Depositary / Broker.

ASC 815-10, "Disclosures about Derivative Instruments and Hedging Activities" amends and expands the disclosure requirements of ASC 815 with the intent to provide users of financial statements with an enhanced understanding of how and why an entity uses derivative instruments. The fair value of open derivative instruments held by the Fund as at June 30, 2021 is disclosed on the face of the Statement of Assets and Liabilities.

As noted in Note 4, the Fund may enter into foreign exchange hedging transactions in the EURO, GBP, CHF and JPY Hedged Share Classes. As a result, the Fund has recognized realized and unrealized gains/losses on foreign exchange derivatives (comprising futures and forward foreign exchange contracts) during the period. The total realized gain on foreign exchange derivatives amounted to (US\$2,257,916) and is included in the Statement of Operations within the balance "Net realized gain on investments in derivative contracts and foreign currency". The total change in unrealized loss on foreign exchange derivatives amounting to (\$4,558,303) is included in the Statement of Operations within the balance "Net change in unrealized loss on investments in derivative contracts and foreign currency". These amounts contribute to off-setting the gains and losses arising on the conversion of ACL Alternative Fund net assets to local currency for the EURO, GBP, CHF and JPY Hedged Share Classes.

## 7. Financial instruments (continued)

## Foreign currency risk (continued)

As at June 30, 2021, the Fund had the following open futures positions for share class hedging purposes:

	No. of contracts	Contract size	Notional Value	Unrealized gain / (loss) in US\$
GBP FX Future Mar 21	106	62,500	6,085,688	(223,594)
EURO FX Future Mar 21	594	125,000	88,097,625	(2,615,828)
JPY FX Future Mar 21	409	12,500,000	46,048,288	(580,269)
CHF FX Future Mar 21	45	125,000	87,750,921	(208,125)
Net unrealized loss				(3,627,815)

## 8. Offsetting assets and liabilities

The Fund is required to disclose the impact of offsetting assets and liabilities represented in the Statement of Assets and Liabilities to enable users of the financial statements to evaluate the effect or potential effect of netting arrangements on its financial position for recognized assets and liabilities. These recognized assets and liabilities are financial instruments and derivative instruments that are either subject to an enforceable master netting arrangement or similar agreement or meet the following right of setoff criteria: the amounts owed by the Fund to another party are determinable, the Fund has the right to set off the amounts owed with the amounts owed by the other party, the Fund intends to set off, and the Fund's right of setoff is enforceable at law.

As of June 30, 2021, the Fund holds financial instruments and derivative instruments that are eligible for offset in the Statement of Assets and Liabilities and Statement of Operations and are subject to a master netting arrangement. The master netting arrangement allows the counterparty to net any collateral held on behalf of the Fund or liabilities or payment obligations of the counterparty against any liabilities or payment obligations of the Fund to the counterparty.

The following table provides disclosure regarding the potential effect of offsetting of recognized assets presented in the Statement of Assets and Liabilities:

	Gross Amount of Recognized Assets	Gross Offset in the Statement of Assets and Liabilities	Net Amounts of Recognized Assets Presented in the Statement of Assets and Liabilities
	US\$	US\$	US\$
Derivative and foreign exchange contracts	111,912,414	-	111,912,414
Total	111,912,414	-	111,912,414

## 8. Offsetting assets and liabilities (continued)

	Net Amounts of Assets presented in the	Gross Amounts Not Offset in the Statement of Assets and Liabilities			
	Statement of Assets and Liabilities	Financial Instruments	Cash Collateral received	Net Amount	
	US\$	US\$	US\$	US\$	
Bank of America N.A.	19,009,691	(16,136,977)	-	2,872,714	
Credit Suisse International	12,152,743	(8,339,209)	-	3,813,534	
Deutsche Bank	4,292,636	(4,292,636)	-	-	
JP Morgan Securities Limited	8,270,699	(4,948,536)	-	3,322,162	
UBS A.G.	2,978,058	(2,978,058)	-	-	
SG Americas Securities, LLC	65,208,587	(38,155,439)	-	27,053,148	
Total	111,912,414	(74,850,855)	-	37,061,559	

The following table provides disclosure regarding the potential effect of offsetting of recognized liabilities presented in the Statement of Assets and Liabilities:

	Gross Amount of Recognized Liabilities	Gross Offset in the Statement of Assets and Liabilities	Net Amounts of Recognized Liabilities Presented in the Statement of Assets and Liabilities
	US\$	US\$	US\$
Derivative and foreign exchange contracts	(98,914,173)	-	(98,914,173)
Total	(98,914,173)	-	(98,914,173)

	Net Amounts of Liabilities presented in the	Gross Amounts Not C Statement of Assets a		
	Statement of Assets and Liabilities	Financial Instruments	Cash Collateral pledged	Net Amount
	US\$	US\$	US\$	US\$
Bank of America N.A.	(18,852,655)	16,136,977	2,715,678	-
Credit Suisse International	(14,111,733)	8,339,209	5,772,524	-
Deutsche Bank AG	(5,376,676)	4,292,636	1,029,875	(54,165)
JP Morgan Securities Limited	(8,732,572)	4,948,536	3,784,036	-
UBS A.G.	(5,278,250)	2,978,058	229,652	(2,070,540)
SG Americas Securities, LLC	(46,562,287)	38,155,439	8,406,848	-
Total	(98,914,173)	74,850,855	21,938,613	(2,124,705)

#### 9. Gains and losses from financial instruments

The following table details the gains and losses from financial assets and liabilities:

	June 30, 2021 US\$
Realized gains on investments in derivative and foreign exchange contracts Net change in unrealized gains on investments in derivative and foreign exchange contracts	651,906,862 122,689,972
Total gains on realized and change in unrealized on investments in derivative and foreign exchange contracts	774,596,834
	June 30, 2021 US\$
Realized losses on investments in derivative and foreign exchange contracts  Net change in unrealized losses on investments in derivative and foreign exchange contracts	

Gains and losses presented above exclude interest income.

## 10. Related party disclosures

The Fund considers the Investment Manager, its principal owners, members of management, members of their immediate families and entities under common control to be related parties to the Fund. Amounts due from and due to related parties are generally settled in the normal course of business. Please see note 4 for details of transactions with the Investment Manager.

ACL Alternative Fund is a master fund which investors may invest in, either directly, or through one of the feeder funds, namely Abbey Capital Multi-Manager Fund Limited, Abbey Capital ACL Alternative Fund, Abbey Capital Daily Futures Fund Limited or ACL Global Fund. Details of interests held by the feeder funds are included in note 6.

The Director fees are not paid directly by the Fund, but are distributed and paid by each of the Trading Funds based on the Fund holdings at month end. All other related party transactions have been fully disclosed in the financial statements, including investments in affiliated funds. None of the Directors hold any investments in the Fund or Trading Funds.

## 11. Brokerage commissions

Brokerage commissions of US\$6,798,322 were paid by the Fund and the Trading Funds to which it allocates its assets for the period from January 1 to June 30, 2021. This amount is included within the realized and unrealized gain or loss on investments in derivative contracts and foreign exchange.

## 12. Commitments and contingencies

In accordance with the FASB subtopic ASC 460-10, the Fund is required to disclose information about commitments and contingencies. In the normal course of business the Fund and Trading Funds of the Company enter into contracts that contain a variety of warranties and indemnifications. The Fund's and the Trading Funds' maximum exposure under these arrangements is unknown as this would involve future claims that may be made against the Fund and Trading Funds that have not yet occurred. However, based on experience, the Fund and the respective Trading Funds expect the risk of loss to be remote.

## 13. Accounting for uncertainty in income taxes

Accounting Standards Codification ("ASC") 740-10 "Accounting for Uncertainty in Income Taxes – an interpretation of ASC 740" clarifies the accounting for uncertainty in income taxes recognized in the Fund's financial statements in conformity with ASC 740 "Accounting for Income Taxes". ASC 740-10 prescribes a recognition threshold and measurement attribute for the financial statement recognition and measurement of a tax position or expected position to be taken on a tax return. Given the Fund's domicile, the investment objective of the Fund and the trading strategies and instruments traded by the Trading Funds, the Directors of the Company have determined there are no uncertain tax positions. In addition, neither the Company nor the Fund is subject to any tax examinations by the tax authorities in their country of domicile or taxing authorities in other jurisdictions.

### 14. Historic Net Asset Values per share (NAV) and Funds under Management (FUM)

Share Class		Dec 31, 2019	Dec 31, 2020	Jun 30, 2021
USD Share Class A	NAV	\$303.81	\$329.55	\$367.40
USD Share Class B	NAV	\$176.77	\$191.27	\$212.89
USD Share Class C	NAV	\$102.66	\$109.97	\$122.50
USD Share Class E	NAV	\$125.61	\$134.90	\$150.29
Euro Hedged Share Class A	NAV	EUR200.36	EUR213.86	EUR237.90
Euro Hedged Share Class B	NAV	EUR111.51	EUR118.73	EUR131.96
Euro Hedged Share Class C	NAV	EUR102.12	EUR107.64	EUR119.04
GBP Hedged Share Class A	NAV	£116.56	£124.92	£139.43
GBP Hedged Share Class B	NAV	£188.65	£201.51	£224.84
GBP Hedged Share Class C	NAV	£94.73	£100.17	£111.33
CHF Hedged Share Class A	NAV	CHF85.03	CHF90.60	CHF100.74
CHF Hedged Share Class B	NAV	CHF105.11	CHF111.71	CHF124.07
CHF Hedged Share Class C	NAV	CHF85.26	CHF89.71	CHF99.13
JPY Hedged Share Class B	NAV	¥9,798	¥10,451	¥11,680
JPY Hedged Share Class D	NAV	¥9,990	¥10,602	¥11,820

# 14. Historic Net Asset Values per share (NAV) and Funds under Management (FUM) (continued)

Share Class		Dec 31, 2019	Dec 31, 2020	Jun 30, 2021
USD Share Class A	FUM	\$1,062,276,786	\$997,810,292	\$1,118,916,958
USD Share Class B	FUM	\$217,726,311	\$193,461,267	\$220,806,419
USD Share Class C	FUM	\$3,529,454	\$3,021,556	\$2,892,290
USD Share Class E	FUM	\$52,099,519	\$53,229,139	\$60,786,921
Euro Hedged Share Class A	FUM	\$60,711,036	\$60,873,127	\$78,754,422
Euro Hedged Share Class B	FUM	\$8,994,218	\$6,245,033	\$7,580,203
Euro Hedged Share Class C	FUM	\$120,369	\$138,101	\$148,179
GBP Hedged Share Class A	FUM	\$147,751,546	\$6,898,524	\$7,292,600
GBP Hedged Share Class B	FUM	\$451,479	\$497,873	\$1,405,141
GBP Hedged Share Class C	FUM	\$251,389	\$274,442	\$308,076
CHF Hedged Share Class A	FUM	\$74,490	\$86,685	\$92,188
CHF Hedged Share Class B	FUM	\$482,709	\$5,413,376	\$5,749,888
CHF Hedged Share Class C	FUM	\$81,296	\$93,423	\$98,739
JPY Hedged Share Class B	FUM	\$35,672,720	\$40,025,700	\$31,016,598
JPY Hedged Share Class D	FUM	\$14,322,007	\$15,118,302	\$14,304,203

## 15. Subsequent events

Events subsequent to June 30, 2021 have been evaluated up to October 14, 2021, the date these interim unaudited Financial Statements were available to be issued.

No material subsequent events have occurred since June 30, 2021 that would require recognition or disclosure in these interim unaudited Financial Statements.

## 16. Approval of the interim unaudited Financial Statements

These interim unaudited Financial Statements were approved by the Board of Directors on October 14, 2021.

## **ACL Alternative Fund**

A segregated account of ACL Alternative Fund SAC Limited

June 30, 2021

## **Appendix**

## Supplemental Disclosures to the interim unaudited Financial Statements

## 1. Additional information for qualified investors in Switzerland

The Fund\* is compliant with Swiss law for distribution to qualified investors in Switzerland. The Confidential Private Placement Memorandum, the Bye-Laws, the annual and semi-annual report, the list of the purchases and sales and further information can be obtained free of charge from the representative in Switzerland: Carnegie Fund Services S.A., 11, rue du Général-Dufour, CH-1204 Geneva, Switzerland, web: www.carnegie-fund-services.ch. The Swiss paying agent is: Banque Cantonale de Genève, 17, quai de l'Ile, CH-1204 Geneva. For the shares of the Fund distributed to qualified investors in Switzerland, the place of jurisdiction is Geneva. This document may only be issued, circulated or distributed so as not to constitute an offering to the general public in Switzerland. Recipients of the document in Switzerland should not pass it on to anyone without first consulting their legal or other appropriate professional adviser, or the Swiss representative.

\*Only the ACL Alternative Fund is compliant with Swiss law for distribution to qualified investors in Switzerland.

Each time performance data is published, it should be noted that the past performance is no indication of current or future performance, and that it does not take account of the commissions and costs incurred on the issue and redemption of shares.