

Hedonova LLC Regulation Best Interest Disclosures



I. Introduction

Hedonova LLC is registered with the Securities and Exchange Commission (“SEC”) as a Regulation D 506(c) fund. Hedonova is also a member of the Financial Industry Regulatory Authority (“FINRA”). This guide provides important information about the brokerage products and services we offer.

II. Information About the Services We Offer

Hedonova is a hedge fund focused on alternative investments with offices in North America, Europe and Asia. Alternative investments describe investments that do not fall in conventional categories like stocks and bonds. Hedonova’s portfolio diversifies with startups, real estate, fine art, wine, cryptocurrencies, and other assets. Hedonova’s single fund structure provides a way for shareholders to invest without needing to manage the day-to-day distribution of its investment.

For additional information regarding our services, please visit www.hedonova.io.

A. Limitations on the Services We Offer

Our standard minimum investment size is \$10,000 USD; however, we may in our sole discretion allow you to invest an amount less than the minimum.

Please be aware that we will only provide investment services to persons eligible to invest under available exemptions from registration under the Securities Act of 1933 (e.g., Section 506, Section 4(a)(7), etc.). For persons interested in investing, this means that you have to meet the definition of “accredited investor.” For individuals, this means that you are generally required to have a net worth of \$1 million, excluding your primary residence. The regulations for accredited investors vary from one jurisdiction to the other and are often defined by the local regulators or competent authority. In the US, the definition of an accredited investor is set forth by [SEC in Rule 501 of Regulation](#).

One reason our offerings are limited to accredited investors is to ensure that all participating investors are financially sophisticated and able to fend for themselves or sustain bouts of volatility or the risk of large losses, rendering the regulatory protections that come with a registered offering unnecessary.

For additional information regarding accredited investors, please read [Accredited investor verification policy](#).

B. Standard of Conduct

Hedonova is a single fund. We do not evaluate your specific investment needs before making investments. The client should read through the fund's offering documents and understand if it's the right investment for them.

Hedonova assumes no liability for your trading and investment results. It should not be assumed that the methods, techniques, or indicators presented in these products will be profitable, or will not result in losses. Past results of any trading system published by Hedonova, whether through the Website or otherwise, are not indicative of future returns by that system or of future returns that you will realize.

Our materials may include historical appreciation percentages that are based on historical price trends. Such information is not intended to be indicative of returns that would have been achieved on Hedonova shares during such periods. Fees, expenses and other factors will create significant differences between the performance of an investment in Hedonova's securities and investment appreciation rates.

For additional information regarding the matter of possible risks, please read [Risk disclosures](#)

C. Fees and Costs

Generally, a private placement memorandum (along with the related organizational and investor subscription documents for subscribing to interest in the Fund) delivered to each potential investor interested in investing in such Private Investment Fund contains description of various types of the fees payable in respect of such investor's investment in such Private Investment Fund and its quantum and method of calculation.

An investment made or committed by an investor in a the Fund is charged two types of fee: an investment management fee and a performance or incentive fee.

- Management fee: One percent of the assets under management is charged to your account at the time of investment and then on an annual basis. Blocks are allocated after deducting management fee. Additional taxes may apply depending on the investor's jurisdiction.
- Performance fee: Ten percent of the gross profit generated from capital gains and dividends is charged at the end of a year. Performance fee is charged on a high-watermark basis.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time.

Please make sure you understand all types of fees and costs that will be charged against your invested capital the Fund.

For additional information regarding costs and fees, please [read more](#).

III. Conflicts of Interest

In its capacity as an investment management company, Hedonova provides investment services and/or ancillary services. In accordance with the Financial Supervision Act, Markets in Financial Instruments Directive I & II, and the Alternative Investment Fund Managers Directive (AIFMD), Hedonova must comply with specific regulations relating to conflicts of interest. A conflict of interest is (i) a conflict between the interests of the group companies and the interests of a client, or (ii) a conflict between the interests of two or more clients of the group companies to whom the group companies have an obligation, or (iii) a conflict between the interests of Hedonova and the interests of the Funds managed by Hedonova or the investors of the Funds or (iv) a conflict between two or more Funds managed by Hedonova or the investors of the Funds.

These conflicts can arise when providing services to clients, and can damage or negatively impact the clients' interests.

A conflict of interest can also exist in the event that Hedonova and/or its employee, or any person directly or indirectly linked to Hedonova by way of control: Gains a financial advantage or avoids a financial loss to the detriment of the Funds being managed; Has an interest in the outcome of a transaction conducted on behalf of the Fund, which is different from the Fund's interest in this result; Has a financial or other incentive to favor the interests of a client or group of clients over the interests of the Fund being managed; Receives cash, goods, or services from third parties in relation to services performed for a fund, other than the standard fees or commissions; Gains a financial advantage or avoids a financial loss to the disadvantage of a client to whom investment services and/or ancillary services are provided when managing Funds

Where conflicts, or potential conflicts are identified, we are committed to ensuring that they are effectively and fairly managed so that they do not constitute or give rise to a material risk of damage to the interests of our clients. Hedonova applies at least one of the following measures to every conflict or potential conflict: Staff training, Segregation of duties, Chinese walls, Record keeping, Regular independent monitoring or review, Implementation of specific policies or procedures concerning, among other things, order execution, personal transactions, remunerations, and inducements, Fixed point on the agenda of all control meetings and other governance forums, Disclosure to clients.