

ITEM 1 – COVER PAGE

**Part 2A of Form ADV
Brochure for:**

Greenoaks Capital Partners LLC

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October 8, 2015

This brochure provides information about the qualifications and business practices of Greenoaks Capital Partners LLC. If you have any questions about the contents of this brochure, please contact us at (415) 805-8922 or jonathan.tang@greenoakscap.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Registration of an Investment Adviser does not imply any certain level of skill or training.

Additional information about Greenoaks Capital Partners LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

Not Applicable as this is our initial registration as an investment adviser with the SEC.

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ITEM 4 – ADVISORY BUSINESS

Description of the Advisory Firm

Greenoaks Capital Partners LLC (the “Investment Manager” or “Greenoaks Capital”) is a limited liability company organized on April 11, 2012 under the law of the State of Delaware. Benjamin Peretz and Neil Mehta are the managing members and beneficial owners of the Investment Manager.

Description of Advisory Services

Greenoaks Capital provides investment advice and management to privately placed investment funds (as described in response to Item 10 below), for which Greenoaks Capital, or an affiliate, is either the general partner or investment manager and an insurance company (“Clients”). Investment advisory services are provided to each Client pursuant to separate investment management agreements between each Client and Greenoaks Capital or its affiliate.

Greenoaks Capital Clients’ investment objective generally is to compound capital at attractive, risk-adjusted rates of return over a long period of time. Greenoaks Capital seek to achieve its objective primarily by implementing investment strategies in the growth equity and venture capital markets.

The Clients conduct a private offering of their interests (“Interests”) to certain qualified investors as described in the response to Item 7, below (such investors and prospective investors are referred herein as “Investors”).

Client Tailored Services and Client Imposed Restrictions

Greenoaks Capital manages the Clients’ investments in accordance with the investment objectives and strategies set forth in the Clients’ offering documents. Generally, there are no material limitations on the instruments, strategies and markets in which the Investment Manager may trade, nor is it subject to any formal diversification requirements or concentration limits and does not require consultation with the Clients or their Investors.

Wrap Fees

Greenoaks Capital does not participate in wrap fee programs.

Assets Under Management

As of December 31, 2014, the Investment Manager had approximately \$450 million, on a discretionary basis, in client regulatory assets under management.

ITEM 5 – FEES AND COMPENSATION

Greenoaks Capital’s compensation for the Clients is described below.

Management Fee

Greenoaks Capital does not charge upfront management fees. However, certain Clients, as disclosed in their operating or investment advisory agreement, reimburse Greenoaks Capital for its out-of-pocket expenses including salary, office rental and other customary general administrative and overhead costs (other than performance based compensation of its employees) properly allocable to the performance of its duties pursuant to the operating or investment advisory agreement, provided, however, that reimbursement or payment of any such expenses in any year in excess of 2 percent of the average monthly net asset value for such year is subject to approval by the board of the Client.

Expenses

Generally, the Clients will bear all costs and expenses related to its investment activity and operations as described in the offering materials. Currently, the Clients are expected to bear the following costs:

- Brokerage, commission, transfer taxes and other transaction costs associated with securities transactions (see Item 12, Brokerage Practices, below)
- Third-party research costs
- Fund administration
- Stock borrow fees
- Professional fees (legal, audit, tax, directors' fees)
- Organizational and initial offering costs (mostly legal fees, may be amortized over 5 years)
- Direct compliance costs (Form PF, 13F, 13G filings fees, etc.)
- Fund insurance

Unless otherwise stipulated in the operating or investment advisory agreement between each Client and their respective Investors, the Investment Manager intends to pay for all travel costs, including research related travel, as well as the costs associated with compliance consulting.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Depending on the performance of the Client's portfolio, the Investment Manager will receive a performance allocation based on a percentage of the Client's net profits (depending on the investment, the percentage ranges between 20 to 50 percent) upon dissolution of the Client or pooled investment vehicle. This performance allocation is subject to the Investors first receiving a full return of their respective invested capital, achieving the agreed upon hurdle return (cumulative interest, compounded on an annual basis, on unreturned capital contributions at an effective annual rate of between 0 to 20 percent). After the hurdle return is achieved by the applicable parties, Greenoaks Capital or affiliated manager is allocated a percentage of the total cumulative hurdle return in proportion to the aforementioned performance allocation percentage applicable to a particular investment vehicle. Only after capital is returned to the Investors (and the Investment Manager as the case may be) and the hurdle return and the hurdle catch-up achieved, is the performance allocation percentage applicable to the remaining net profits of the pooled investment vehicle. Investors consent to such terms when they execute the operating agreement and submit their signed subscription documents.

Greenoaks Capital is guided by fiduciary principles in the management of conflicts of interest. Put simply, Greenoaks Capital is expected to always act in the best interests of its clients.

Greenoaks Capital's fiduciary obligation applies in every aspect of its dealings with clients, regardless of the account relationship, assets under management or fee structure. To address these types of conflicts, Greenoaks Capital has adopted policies and procedures pursuant to which allocation decisions may not be influenced by fee arrangements, and investment opportunities will be allocated in a manner that Greenoaks Capital believes is consistent with its obligations as an investment adviser.

The Investment Manager may cause a Client to invest in another Client to the extent it is in the best interest of both Clients and the transaction is effected in accordance with the fund offering documents at a valuation determined in good faith by the Investment Manager in accordance with its valuation policies and procedures. To the extent that a Client is invested in another Client commonly managed by the Investment Manager or its affiliates, the performance-based

fee, if applicable, will only be applied once (generally, the level at which the third-party Investors' capital is invested).

ITEM 7 – TYPES OF CLIENTS

Greenoaks Capital provides investment advisory services to Clients, which are private funds and an insurance company. Investment advice is provided directly to the Clients and not individually to Investors. In general, only Investors that are both “qualified purchasers” and “accredited investors” may acquire an interest in the Clients. All Investors must be financially sophisticated and capable of evaluating the risks and merits of an investment in the Clients.

The Investment Manager may accept or reject subscriptions in whole or in part, and may waive the succeeding minimums as it may determine.

- In general, interests are offered to both U.S. taxable persons as well as non-residents. Greenoaks Capital does not actively solicit investors outside the U.S. The minimum initial investment as stated in fund offering documents is \$1,000,000, however, the Investment Manager may waive the minimum in its sole and absolute discretion.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

General

The focus of the Investment Manager's strategy is on identifying and investing in compounding franchises. The Investment Manager performs detailed fundamental analysis on each company's applicable market, management team, competitive advantages, unit economics, and financial model. The analysis is a resource-intensive exercise. The Investment Manager's in-depth analysis will be performed by its personnel.

Investment Strategies

The Investment Manager's strategy is focused on cumulative returns over a number of years, with less concern for the level of short-term performance volatility experienced by the Clients.

The Investment Manager will seek to achieve Clients' objectives by investing in private and public companies globally, leveraging the Investment Manager's operational and investment experience in a number of these markets. The Clients will invest in a wide range of geographies and sectors where the Investment Manager believes that it has identified attractive investment opportunities based on its primary research and fundamental analysis.

Greenoaks Capital investment philosophy is focused on acquiring positions in high quality businesses with strong management teams at reasonable valuations. It focuses on comprehensive and creative primary research to develop a differentiated view on the businesses. The Investment Manager believes that its investigative, research-focused process and long-term investment horizon differentiate its approach.

There can be no assurance that the Clients will achieve their investment objectives or avoid incurring substantial or total losses.

Risks

Investing in securities involves risk of loss that Investors should be prepared to bear. Below are some of the risks that Investors should consider before investing in any Greenoaks Capital

Clients. Any or all of such risks could materially and adversely affect investment performance, the value of any account, and could cause Investors to lose their entire investment. Potential Investors in Greenoaks Capital should review the Clients' offering circular or private offering memorandum carefully and in its entirety, and consult with their professional advisers before deciding whether to invest.

The following risks are not a complete explanation of the risks involved in an investment in the Clients.

Potential Loss of Investment -The Client is speculative and involves a substantial degree of risk. There can be no assurance that the Clients will achieve their objective or avoid incurring substantial or total losses.

Volatility -The Clients' performance is expected to be volatile. The Investment Manager's strategy purposefully tolerates greater short-term volatility than would be acceptable to many investors with the objective of achieving long-term profitability.

Unpredictable Investor Sentiment -Investor sentiment regarding the market, an industry or an individual stock, fixed income or other security is not predictable and can adversely affect the Clients' investments.

Investment Information - The Investment Manager may not be able to obtain complete or accurate information about an investment and may misinterpret information it receives. It also may receive material, non-public information about an issuer that prevents it from trading securities of that issuer for a Client when the Client could make a profit or avoid losses.

Fundamental Analysis -Fundamental analysis is subject to the risk of inaccurate or incomplete market information (an endemic problem with emerging markets), as well as the difficulty of predicting future prices based upon analysis of all known information. Investments made based upon fundamental analysis are subject to significant losses when market sentiment leads to market prices being materially discounted from the expected prices indicated by fundamental analysis or when technical factors, such as price momentum encouraged by trend following, dominates the market.

Equity Strategies Market Risks -The Investment Manager's equity strategies are subject to multiple dimensions of market risk: unexpected directional price movements; emerging market investing risk; changes in the regulatory environment; changes in market volatility; political and market disruptions; misconduct by management; inaccurate government and financial reporting; unequal access to market information; etc.

Interest Rate Change -The prices of the securities (both equity and fixed-income) held by the Clients may be sensitive to interest-rate fluctuations. In addition, interest-rate increases generally will increase the costs of any leverage used by the Clients.

Counterparty Risk -Counterparties such as brokers, dealers, custodians and administrators with which the Investment Manager does business on behalf of Clients may default on their obligations. For example, the Clients may lose its assets on deposit with a broker if the broker, its clearing broker or an exchange clearing house becomes bankrupt.

Duration of Investment Positions -The markets and investments to which the Clients will generally commit substantial portions of its portfolio are purposefully long-term, and may result in material economic dilution due to the fair value/“true value” discrepancy. The Investment Manager will often be unable to liquidate the Clients’ longer-term positions at reasonable prices over a reasonable period of time, should the Investment Manager determine that an investment is no longer likely to realize its profit potential.

Concentration of Investments - Greenoaks Capital has broad discretion with respect to the size of the companies in which it may invest, or the concentration of investments (by sector, industry, capitalization, company, country or asset class) on behalf of its Clients. At times Clients may hold a relatively small number of securities positions, each representing a relatively large portion of each Client’s capital and may hold a large percentage of the capital in cash while awaiting better opportunities. Losses incurred in such positions could have a material adverse effect on the Client’s overall financial condition, including opportunity loss.

Additionally, the Client’s portfolio at any given point in time may be highly concentrated in emerging markets investments. The developing nature of emerging markets can be expected to result in increased performance volatility and risk.

Common Stocks - Common stock prices are directly affected by issuer-specific events, as well as general market conditions. The Investment Manager may cause the Client to take positions in securities of small, unseasoned companies that are less actively traded and more volatile than those of larger companies. In addition, in many countries investing in common stocks is subject to heightened regulatory and self-regulatory scrutiny as compared to investing in debt or other financial instruments.

Low-Priced Securities - The Clients may invest in securities with relatively low prices, and which are, consequently, subject to materially greater percentage price fluctuations than many higher-priced securities. Low-priced securities also risk being de-listed from trading and losing market following and liquidity.

Fixed-Income Investments - The pricing of fixed-income instruments is directly affected by interest-rate changes. When interest rates decline, the value of outstanding fixed-income instruments typically rises. Conversely, when interest rates rise, the value of outstanding fixed-income instruments typically declines.

Illiquid Investments -The Client may trade and invest from time to time in illiquid and restricted, as well as thinly-traded, instruments and securities (including privately placed securities and instruments). There may be no trading market for these securities and instruments, and the Client might only be able to liquidate these positions, if at all, at disadvantageous prices.

Valuation of Assets - Greenoaks Capital is responsible for the valuation of each Client's assets, in accordance with such Client's Governing Documents and valuation policies. There is no actively traded market for most of the securities owned by the Clients. Securities and all other assets for which no market prices are available will be valued at such value as Greenoaks Capital may reasonably determine. Valuations are generally subject to multiple levels of review for approval and ensuring that portfolio investments are fairly valued is an important focus of Greenoaks Capital. However,

the process of valuing securities for which reliable market quotations are not available is based on inherent uncertainties and the resulting values may differ from values that would have been determined had an active market existed for such securities and may differ from the prices at which such securities may ultimately be sold. Third-party pricing information may at times not be available regarding certain of a Client's assets. It is Greenoaks Capital's policy to determine the "fair value" of the Client assets in accordance with U.S. Generally Accepted Accounting Principles, particularly Accounting Standard Codification 820, Fair Value Measurements. When estimating fair value, Greenoaks Capital will apply a methodology based on its best judgment that is appropriate in light of the nature, facts and circumstance of the investments. Among other things, Greenoaks Capital will consider: the evaluation of arm's length financing and sales transactions with third parties, an income approach reflecting a discounted cash flow analysis, and a market approach, that includes, but is not limited to comparative analysis of performance multiples and pricing multiples generated by market participants for equity investments; option pricing models in valuing warrants that are not traded on major securities exchanges; and the face value and unpaid dividends or interest for private debt investments. With respect to the Clients, the exercise of such discretion by Greenoaks Capital may give rise to conflicts of interest, as the performance allocation with respect to certain Clients is calculated based on these valuations and such valuations affect performance calculations.

The above is only a summary of some of the significant risks that a Client or Investor may encounter. Prospective Investors should review the applicable Clients' Offering Documents carefully and completely, and consult with their professional advisers before deciding whether to invest. A prospective Client or Investor should discuss with the Investment Manager's representatives any questions that such person may have before investing in a Client.

ITEM 9 – DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or a potential client's evaluation of Greenoaks Capital or the integrity of Greenoaks Capital's management. Greenoaks Capital has no information applicable to this Item.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Various entities serve as general partners or managing members of the Client funds, and are related persons of Greenoaks Capital. For a description of material conflicts of interest created by the relationship among Greenoaks Capital and the general partners and managing members, as well as a description of how such conflicts are addressed, please see Item 11 below.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Greenoaks Capital has adopted a Code of Ethics ("Code"), pursuant to SEC rule 204A-1, that describes the standards of business conduct that it requires of employees and accounts owned predominantly by persons associated with Greenoaks Capital, and establishes procedures intended to prevent Greenoaks Capital, and its personnel and certain of their relatives, from inappropriately benefiting from Greenoaks Capital's relationships with its Clients. The Code is updated at least annually. The Code provides that:

- The policies and procedures are based on general concepts of fiduciary duty to Clients;
- Greenoaks Capital's Clients' interests come before Greenoaks Capital's or its employees' interests;
- Each employee's professional activities and personal investment activities must be consistent with this Code and avoid any actual or potential conflict between the interests of Clients and those of Greenoaks Capital or its employees;
- Employees must abide by the standards set forth in Rule 204A-1 (the "code of ethics rule") for registered investment advisers under the Advisers Act;
- Greenoaks Capital must disclose to Clients all material facts about conflicts of which it is aware between Greenoaks Capital's and its employees' interests on the one hand and Clients' interests on the other;
- Employees must operate on Greenoaks Capital's and their own behalf consistently with Greenoaks Capital's disclosures to and arrangements with Clients regarding conflicts and its efforts to manage the impacts of those conflicts; and,
- All Employees will act with competence, dignity and integrity, in an ethical manner, when dealing with Clients, the public, prospective clients or investors, third-party service providers and fellow employees.

The Code provides that Employees may not purchase more than 1.0% of the outstanding shares of any publicly listed company.

Greenoaks Capital requires pre-approval for an employee to: a) sell individual issuer securities held prior to employment; b) invest in hedge funds and/or other private placements; and 3) invest in initial public offerings. In addition, employees are required to report their securities transactions quarterly to Greenoaks Capital. The Code also contains restrictions on and procedures to prevent inappropriate trading while Greenoaks Capital is in possession of material nonpublic information.

Greenoaks Capital will provide a copy of its Code of Ethics to any client or prospective client upon request. Such a request may be made by submitting a written request to Greenoaks Capital via email or to the address on the cover page of this brochure.

Conflicts of Interest

Below is a summary of material conflicts that arise in connection with the participation or interest of Greenoaks Capital and its affiliates and personnel in Client transactions, including participation through an investment in the Client funds and an interest arising from serving as a director or in another role with respect to the issuer of securities held by a Client fund. For a more complete description of the potential conflicts of interest relating to a particular Client fund, please refer to the offering memorandum for such Client fund.

While Client funds do not typically engage in cross-trade transactions, Client funds have previously engaged in a cross-trade transaction and may do so in the future under certain limited circumstances. Greenoaks Capital does not receive any compensation in addition to its regular advisory fees, and is not deemed to be a broker for purposes of Section 206(3) of the Investment Advisers Act, in connection with any such transactions. An internal cross-trading transaction is defined as a transaction where the investment adviser effects a transaction between two or more of its funds, and may entail a conflict of interest because the adviser acts for both funds and may have an incentive to improve the performance of one fund by selling an underperforming asset to

another for example, to earn fees and/or improve its performance allocation. Greenoaks Capital recognizes its fiduciary duties and has a policy of treating all Clients fairly and equitably, and has adopted written policies and procedures designed to comply with its duties.

In the case of all conflicts of interest, Greenoaks Capital determines which factors are relevant, and how to mitigate and resolve such conflicts, using its best judgment, but in its sole discretion. In resolving conflicts, Greenoaks Capital may consider various factors, including the interests of the applicable Clients with respect to the immediate issue and/or with respect to their longer term courses of dealing.

More detailed procedures for resolving specific conflicts of interest are set forth in the offering memorandum and organizational documents of the applicable Client fund, and certain additional conflicts are disclosed elsewhere in this brochure.

As previously described, Greenoaks Capital may cause a Client to invest in another Client to the extent it is in the best interest of both Clients and the transaction is effected in accordance with the fund offering documents at a valuation determined in good faith by Greenoaks Capital in accordance with its valuation policies and procedures. To the extent that a Client is invested in another Client commonly managed by Greenoaks Capital or its affiliates, the performance-based fee, if applicable, will only be applied once (generally, the level at which the third-party Investors' capital is invested).

ITEM 12 – BROKERAGE PRACTICES

Greenoaks Capital will have complete discretion in deciding what brokers and dealers the Clients will use and in negotiating rates of brokerage compensation.

General Selection Criteria

Although Greenoaks Capital does not generally trade in listed securities, to the extent such transactions were effected by Greenoaks Capital, it is Greenoaks Capital's policy to seek best execution, based upon a number of considerations, from the brokers with whom it places trade for execution on behalf of its Clients. While trade price is often a significant quantitative factor in best execution, the Investment Manager also evaluates qualitative execution factors, such as research capabilities, success of prior research recommendations, ability to execute trades, nature and frequency of sales coverage, depth of services provided (including back office and processing capabilities), financial stability and responsibility, reputation, commission rates, responsiveness to the Investment Manager and the value of research and brokerage products and services provided by such brokers. The determining factor is not the lowest possible commission cost alone.

Greenoaks Capital may use a broker where a division or affiliate of such broker may have referred or may refer Investors to the Investment Manager. The Investment Manager, however, does not consider such referrals in its selection of brokers.

Soft Dollars

Greenoaks Capital does not currently utilize soft dollars.

Trade Errors

To the extent Greenoaks Capital trades in public securities, it may from time to time make trade errors. Greenoaks Capital is obligated to reimburse the Clients for any trade error resulting

from Greenoaks Capital's fraud, bad faith, gross negligence or reckless or intentional misconduct, but not otherwise. Greenoaks Capital will itself determine in good faith whether or not a given trade error is required to be reimbursed under the foregoing liability standard. Greenoaks Capital will have a conflict of interest in determining whether a trade error should be for the account of the Client or Greenoaks Capital and will attempt to resolve such conflict by an objective determination of the status of such trade error under the applicable liability standard. Any gains recognized on trade errors will be for the benefit of the Client; no gains will be retained by Greenoaks Capital. Subject to confidentiality concerns, Greenoaks Capital will make its trade error policy available to any prospective or existing Investor upon request.

ITEM 13 – REVIEW OF ACCOUNTS

Greenoaks Capital actively manages the Clients' investment portfolio. The portfolio positions and cash are typically reviewed periodically. The portfolio manager is responsible for continuously reviewing the Client accounts, taking into account asset allocation, cash management, investment ideas, economic developments, current events, investment strategies, among other things.

The Clients will distribute to each Investor written annual reports of the performance, as well as such other information periodically as Greenoaks Capital may deem appropriate.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Registered investment advisers are required to disclose all material facts regarding any compensation or other benefits it receives, directly or indirectly, for client referrals. Greenoaks Capital does not pay or redirect a portion of its fees to persons who have introduced clients to Greenoaks Capital. Greenoaks Capital does pay marketers/promoters for introducing investors to clients that Greenoaks Capital advises in compliance with the solicitor's rule.

ITEM 15 – CUSTODY

Greenoaks Capital or an affiliate is deemed to have "custody" of the assets of Client fund assets. Each Client fund's cash and securities is required to be maintained by a "qualified custodian" in such fund's name, unless the security is otherwise exempt from this requirement (e.g., certain privately offered securities). The financial statements of certain Client funds will be (a) prepared in accordance with GAAP, (b) audited by an independent accounting firm that is registered with, and subject to regular examination by, the Public Company Accounting Oversight Board ("PCAOB") and (c) distributed to the Client fund's investors (i) within 120 days following such fund's fiscal year end and (ii) promptly after liquidation. Certain Client funds are not audited as described above. With respect to those funds, an independent accountant that is registered with, and subject to examination by, the PCAOB will verify the cash and securities of such fund by a surprise examination conducted on an annual basis pursuant to a written agreement. In addition, Greenoaks Capital will ensure that certain securities that would otherwise be exempt are held by a "qualified custodian," that will send an account statement, at least quarterly, to such fund and each of its investors identifying the amount of cash and each security of the fund held by such "qualified custodian" at the end of the period and each transaction by the fund in such account during that period. The independent accountant is required to make certain disclosures with the SEC and notify the SEC within one business day of any material discrepancies discovered during the course of the surprise custody examination.

ITEM 16 – INVESTMENT DISCRETION

Greenoaks Capital has discretionary authority to manage securities accounts on behalf of Clients pursuant to a grant of authority in each Client's governing documents. Greenoaks Capital has broad discretion, without limitation, to determine:

- Investment objective of the Clients' account;
- Any changes or modifications to those objectives;
- Securities to be bought or sold for Clients' accounts;
- Amount of securities to be bought or sold for Clients' accounts; and
- Broker or dealer to be used for a purchase or sale of securities for Clients' accounts.

ITEM 17 – VOTING CLIENT SECURITIES

Greenoaks Capital has adopted proxy voting policies and procedures. The policies require Greenoaks Capital to vote proxies received in a manner consistent with the best interests of the Clients.

The policies also require Greenoaks Capital to vote proxies in a prudent and diligent manner intended to enhance the economic value of the assets of the Clients. However, the policies permit Greenoaks Capital to abstain from voting proxies in the event that a Client's economic interest in the matter being voted upon is limited relative to Client's overall portfolio or the impact of the Client's vote will not have an effect on its outcome or on the Client's economic interests.

Although many proxy proposals can be voted in accordance with Greenoaks Capital's proxy voting guidelines, some proposals will require special consideration, and Greenoaks Capital will make a decision on a case-by-case basis in these situations, including proposals to: eliminate director mandatory retirement policies; rotate annual meeting locations and dates; grant options and stock to management and directors; and indemnify directors and/or officers.

Where a proxy proposal raises a material conflict between Greenoaks Capital's interests and the interests of the Clients, Greenoaks Capital will seek to resolve the conflict consistent with its fiduciary duty to its Clients.

Greenoaks Capital will provide, upon request, a copy of those policies and procedures and/or information concerning its voting record on account proxy matters.

ITEM 18 – FINANCIAL INFORMATION

Greenoaks Capital has no financial commitment that is reasonably likely to impair its ability to meet contractual and fiduciary commitments to Clients. Greenoaks Capital has not been the subject of a bankruptcy petition.

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Not applicable.