

# FORM ADV: Uniform Application for Investment Adviser Registration

## Part 2A – Firm Brochure

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### Item 1: Cover Page

Name of Investment Adviser:	<b>Renaissance Technologies LLC</b>
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Date of Brochure:	<b>March 27, 2024</b>

This brochure (the "Brochure") provides information about the qualifications and business practices of Renaissance Technologies LLC, an investment adviser registered with the United States Securities and Exchange Commission ("SEC"). The Firm's registration does not denote a certain level of skill or training.

The information set forth herein has not been approved or verified by the SEC or by any state securities authority.

If you have any questions about the contents of this Brochure, please contact Renaissance Technologies LLC at (212) 829-4460. Additional information about Renaissance Technologies LLC is available on the SEC's website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Material Changes**

Since the annual update of ADV Part 2A dated March 30, 2023, the following material amendments have been made:

Item 4, Advisory Business, has been amended to reflect the merger of the trading subsidiary for the Renaissance Institutional Diversified Global Equities (“RIDGE”) Funds, RIDGE Master Trading L.P., with and into the trading subsidiary for the Renaissance Institutional Diversified Alpha (“RIDA”) Funds, GF Trading LLC, effective December 31, 2023 (the “Merger”). The result of the Merger was a single, combined trading subsidiary, GF Trading LLC, in which RIDA LLC and RIDA L.P. (the “RIDA Feeders”) and RIDGE Onshore Fund L.P. and RIDGE Offshore Fund L.P. (the “RIDGE Feeders”) are invested. The RIDA Funds thus now include both the RIDA Feeders and the RIDGE Feeders. (As noted below, several other Items have been amended to reflect the Merger.) In addition, the amount of the Firm’s regulatory assets under management has been updated.

Item 5, Fees and Compensation, has been amended to remove references to the RIDGE Funds and include the fee and expense information for the RIDGE Feeders in the fee and expense information for the RIDA Funds in light of the Merger. In addition, this Item has been amended to clarify certain expenses for the Medallion, RIEF, and RIDA Funds.

Item 6, Performance-Based Fees and Side-by-Side Management, has been amended to remove a reference to the RIDGE Funds in light of the Merger.

Item 7, Types of Clients, has been amended to remove a reference to the RIDGE Funds and include minimum initial investment and minimum account maintenance requirements for the RIDGE Feeders in the information for the RIDA Funds in light of the Merger.

Item 8, Methods of Analysis, Investment Strategies, and Risk of Loss, has been amended to remove references to the RIDGE Funds in light of the Merger. This Item has also been amended to reflect updated language in offering memoranda and to incorporate certain additional risk and other disclosures.

Item 10, Other Financial Industry Activities and Affiliations, has been amended to remove references to the RIDGE Funds and a related services agreement in light of the Merger. In addition, this Item has been amended to reflect the retirement of a management person associated with RIM.

Item 13, Review of Accounts, has been amended to remove references to the RIDGE Funds and include information regarding reports for investors in the RIDGE Feeders in the information for the RIDA Funds in light of the Merger.

Item 14, Client Referrals and Other Compensation, has been amended to remove a reference to the RIDGE Funds in light of the Merger.

Item 15, Custody, has been amended to remove a reference to the RIDGE Funds and include information regarding statements for investors in the RIDGE Feeders in the information for the RIDA Funds in light of the Merger.

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#### **Item 4: Advisory Business**

Renaissance Technologies LLC ("Renaissance" or the "Firm") is an investment management firm, founded in 1982, that implements quantitative investment strategies on behalf of its clients. It acts as general partner, managing member, and/or investment manager to U.S. and non-U.S. private investment funds (the "Funds") and an institutional account ("Account") that invests in a variety of securities, futures, and derivatives contracts.

Renaissance is owned by two parent companies: Renaissance Technologies Holdings Corporation (with approximately a 78% stake) and RTC II Holdings LLC (with approximately a 22% stake). Each parent company is, in turn, owned by current and certain former principals of the Firm and certain related persons.

Renaissance uses quantitative analysis, specifically, mathematical and statistical methods, to uncover technical indicators that drive its automated trading systems. These systems, or models, are the product of an extensive research effort by Renaissance's technical staff who hold advanced degrees in mathematics and the sciences.

The Firm's quantitative analysis and trading activities are applied to mature, highly liquid, publicly traded instruments in the following asset classes: U.S. and non-U.S. equities, debt instruments, futures, forwards, and foreign exchange, as well as derivatives thereon.

Generally, the Firm provides its advisory services to affiliated collective investment pools that are part of three distinct master-feeder fund structures (the "Fund Families"): (1) the Medallion Funds, which employ a short-term, quantitative trading strategy across multiple asset classes; (2) the Renaissance Institutional Equities Funds (the "RIEF Funds"), which employ a net-long trading strategy in U.S. and non-U.S. equity securities that are publicly traded on U.S. securities exchanges (and certain derivatives thereon); and (3) the Renaissance Institutional Diversified Alpha Funds (the "RIDA Funds"), which trade equity securities that are publicly traded on global securities exchanges and derivatives thereon.<sup>1</sup> In addition, the Firm operates Renaissance Kaleidoscope Fund LLC ("Kaleidoscope Fund"), a fund of funds for employee and employee-related investors that currently invests in each of the Medallion, RIEF, and RIDA Fund Families.

Investors in each Fund Family choose among various feeder funds according to their domicile, tax status, and other attributes. Within certain Funds, investors may also choose among various series that have different fee structures and, in some cases, rights related to portfolio transparency. Beyond these offerings, the Firm does not tailor its advisory services to individual investor requirements. For the Account, the Firm accepts client-imposed investment guidelines and restrictions.

As of December 31, 2023, the Firm's regulatory assets under management totaled \$89,259,682,162. All assets are managed on a discretionary basis.

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<sup>1</sup> Effective December 31, 2023, RIDGE Master Trading L.P., which previously served as the trading subsidiary through which the trading activities of a fourth fund family, the Renaissance Institutional Diversified Global Equities ("RIDGE") Funds, were conducted, merged with and into GF Trading LLC, the trading subsidiary for RIDA Fund LLC and RIDA Fund L.P. (the "RIDA Feeders"). The result of the Merger was a single, combined trading subsidiary, GF Trading LLC, in which the RIDA Feeders and RIDGE Onshore Fund L.P. and RIDGE Offshore Fund L.P. (the "RIDGE Feeders") are invested. The RIDA Funds thus now include both the RIDA Feeders and the RIDGE Feeders.

## **Item 5: Fees and Compensation**

The Firm's fees are set forth in each Fund's offering materials. They are not negotiable. Generally, clients are assessed (1) a management fee equal to a percentage of net asset value and, if applicable, (2) performance-based compensation, which is calculated as a percentage of net profits or net capital appreciation (realized and unrealized), which are allocated to the investors' accounts. Management fees, if applicable, are payable regardless of profitability and may be charged during periods of loss. All performance-based allocations, if applicable, are charged in accordance with Rule 205-3 under the Investment Advisers Act of 1940.

Fee schedules for each Fund Family are as follows:

### **Medallion Funds**

Management Fees	4.00% of value of capital account	Annual fee, payable monthly in advance
Performance Allocation	36.00%-44.00% of net profits	Payable in arrears semiannually or upon redemption

Management fees, calculated at an annual rate of 4% of the value of an investor's capital account, are paid to the Firm monthly in advance based on the value of each capital account at the beginning of that month. The management fee is calculated after taking account of any redemptions or distributions as of the end of the prior month, as well as new subscriptions for the month in which the fee is being calculated and paid. A performance allocation (if applicable), payable to the Firm as of June 30<sup>th</sup> and December 31<sup>st</sup> of each year, is calculated as a percentage of net profits (both realized and unrealized) allocated to each interest or share for the preceding six-month period. The percentage of the performance allocation may vary. A performance allocation (if applicable) will also be made upon the redemption of all or part of an interest or share if such redemption occurs on a date other than the close of a semiannual fiscal period. To the extent that losses are allocated to an interest or share, all such losses (except losses related to redeemed interests or portions thereof) must be recouped before the Firm is entitled to a performance allocation with respect to such interest or share. Once made, a performance allocation is nonrefundable.

### **RIEF Funds**

Management Fees	0.20%-1.50% of net asset value	Annual fee, payable monthly in advance
Performance Allocation	0.00%-10.00% of net capital appreciation	Payable in arrears annually or upon redemption

Management fees are paid monthly in advance based on the net asset value of each interest at the beginning of each calendar month. Management fees are calculated after taking account of any redemptions or distributions as of the end of the prior month. Management fees attributable to a new capital contribution are not charged for the calendar month in which the new contribution is accepted (excluding, however, (1) transfers between RIEF Funds (other than RIEF RMP LLC ("RIEF RMP"), which trades for employee and employee-related accounts separately from the other RIEF Funds) and (2) switches between offered series within a RIEF Fund).

A performance allocation (if applicable) is generally calculated at the end of each calendar year as a percentage of net capital appreciation (both realized and unrealized) in each interest. For the purpose of profit and loss allocation, only 50% of a new capital contribution is deemed invested for the contributing investor's account during the calendar month the contribution is accepted (excluding, however, (1) transfers between RIEF Funds other than RIEF RMP and (2) switches between offered series within a RIEF Fund). A performance allocation (if applicable) will also be made upon the redemption of all or part of an interest before the end of a calendar year. Similar principles will apply to switches between series of a RIEF Fund and transfers to certain other Renaissance Funds, as appropriate. To the extent that an interest has net losses (except losses related to redeemed interests or portions thereof), all such losses must be recouped

before the Firm is entitled to a performance allocation for that interest. No performance allocation, once made, will be refundable.

### **RIDA Funds**

Management Fees	0.85%-1.00% of net asset value	Annual fee, payable monthly in advance
Performance Allocation	10.00% of net capital appreciation	Payable in arrears annually or upon redemption

Management fees are paid monthly in advance based on the net asset value of each interest at the beginning of each calendar month. Management fees are calculated after taking account of any redemptions or distributions as of the end of the prior month. Management fees attributable to a new capital contribution are not charged for the calendar month in which the new contribution is accepted (excluding, however, (1) transfers between RIDA Funds and (2) switches between offered series within a RIDA Fund).

A performance allocation is generally calculated at the end of each calendar year as a percentage of net capital appreciation (both realized and unrealized) in each interest. For the purpose of profit and loss allocation, only 50% of a new capital contribution is deemed invested for the contributing investor's account during the calendar month the contribution is accepted (excluding, however, (1) transfers between RIDA Funds and (2) switches between offered series within a RIDA Fund). A performance allocation will also be made upon the redemption of all or part of an interest before the end of a calendar year. Similar principles will apply to switches between series of a RIDA Fund and transfers to certain other Renaissance Funds, as appropriate. To the extent that an interest has net losses (except losses related to redeemed interests or portions thereof), all such losses must be recouped before the Firm is entitled to a performance allocation for that interest. No performance allocation, once made, will be refundable.

### **Kaleidoscope Fund**

Investors are not charged any direct management fee or performance allocation at the Fund level. However, the Kaleidoscope Fund is responsible for its allocable portion of the management fee and performance allocation charged to investors in each of the underlying funds. Such fees and compensation are reflected in the performance returns of the underlying funds. It is possible that the Fund may be required to bear its pro rata share of performance allocations for one or more of the underlying funds, even if Kaleidoscope as a whole has not realized a profit.

Any management fees and performance allocations for the Funds will be charged and allocated against investors' capital accounts according to the schedules set forth above.

For the Account, the Firm submits invoices for its advisory services.

The **Medallion Funds** bear the following expenses (comprising both expenses of the relevant feeder fund and its pro rata portion of the expenses of affiliated trading entities):

1. transaction costs and investment-related expenses incurred in connection with trading activities, including margin interest (if any), brokerage, clearing, and custodial expenses;
2. in connection with specific transactions, certain professional fees for independent accountants, attorneys, or other experts or consultants (note that Renaissance pays certain operating costs of the Funds, including, e.g., those incurred with respect to offering interests, auditing financial statements, and preparing tax returns, as well as professional fees of the Funds' attorneys unrelated to specific transactions, and, when applicable, the fees and expenses of a corporate services provider in Bermuda);
3. interest, fees, and costs of Fund-related borrowings;
4. interest due to investors in connection with redemptions;
5. certain operational and overhead expenses not paid by the Firm;
6. extraordinary expenses (e.g., litigation costs and indemnification obligations), if any; and
7. taxes and fees payable to governmental agencies or authorities.

The expenses borne by the **RIEF Funds** and **RIDA Funds** include but are not limited to the following (comprising both expenses of the relevant feeder fund and its allocable share of the expenses of the trading subsidiary), if applicable:

1. investment-related expenses, including prime brokerage charges, charges related to its securities lending arrangements, clearing and execution costs, dealer mark-ups, custodial expenses, investment-related research costs, and commitment fees and related charges, as well as any future agency lending arrangements;
2. legal, bookkeeping, accounting, administration, auditing, tax preparation, insurance, and related charges;
3. expenses associated with the continued offering of the Funds;
4. governmental compliance, filing, and related expenses, including, when applicable, fees and expenses of a corporate services provider in Bermuda and Bermuda governmental charges;
5. other operational expenses, if any; and
6. extraordinary expenses (such as indemnification obligations), if any.

The **Kaleidoscope Fund** bears the following expenses:

1. its allocable portion of the underlying funds' investment-related expenses (including transaction charges and clearing, custody, execution, and dealer mark-up costs) and operational and extraordinary expenses, and taxes and fees payable to government agencies or authorities, if any, and
2. the Fund's own legal, accounting, auditing, and tax preparation costs (if any), other operating charges, and extraordinary expenses (if any).

**PLEASE REFER TO BROKERAGE PRACTICES FOR ADDITIONAL INFORMATION REGARDING THE FIRM'S BROKERAGE ARRANGEMENTS.**

The Firm has an affiliated broker-dealer, Renaissance Institutional Management LLC ("RIM"), which is currently the exclusive placement agent for the private placements of securities in the RIEF and RIDA Fund Families. Neither the Firm, RIM, nor any of their supervised persons accept compensation for the sale of securities or other investment products.

#### **Item 6: Performance-Based Fees and Side-by-Side Management**

As described above, the Firm provides its advisory services to affiliated collective investment pools that are part of the Fund Families and the Kaleidoscope Fund. Within the Medallion, RIEF and RIDA Fund Families, investors are able to select among various series, some of which charge a performance allocation, while others do not. The Account is traded based on the Medallion strategy; it is not charged performance-based fees.

Investors in all Funds, including any series within a Fund, invest through collective investment pools, and all series of interests within a Fund trade according to the same strategy, regardless of the type of fee that is assessed. Trading results are calculated pro rata and allocated in accordance with the terms for each series. Given the nature of the Firm's trading systems and strategies, no subset of investors, including those subject to performance-based fees, can be favored over another. (Within the RIEF Funds, a separate fund, RIEF RMP, trades for employee and employee-related accounts in a manner parallel to the trading vehicle for the other RIEF Funds.)

Certain employees of Renaissance have substantially greater investments in the Medallion Funds than they have in the other funds managed by Renaissance and, in many cases, have invested only in the Medallion Funds. In addition and unrelated to such investments, the Medallion Funds are subject to significantly higher management fees and/or performance allocations than those applicable to the other Funds, and those fees and performance allocations are largely responsible for the amount of compensation that Renaissance employees receive. Consequently, these employee investments and the relationship between fees and employee compensation create incentives for employees to favor the Medallion Funds.

Among the Fund Families, and given the differences in trading strategies and fee structures, any potential conflicts regarding order placement or allocation are addressed systemically. The Firm operates the models for each of its Fund Families on separate machines that do not interact with one another. If a Fund and any other Firm-sponsored investment entity attempt to place orders in the same instrument, in the same direction, and at the same time, the Firm's systems do not combine the orders but randomly allow one order to go first. The Firm does not engage in post-trade allocations among orders placed by different Funds.



### **Item 7: Types of Clients**

As set forth above in Item 4, Advisory Business, Renaissance's clients include the Fund Families, the Kaleidoscope Fund, and the Account.

<b>Fund Family</b>	<b>Minimum Initial Investment<sup>2</sup></b>	<b>Minimum Investment Required to Maintain Account<sup>2</sup></b>
Medallion Fund Family	\$25,000 or as determined by Renaissance or the Fund's directors	\$10,000 or as otherwise determined by Renaissance or the Fund's directors
RIEF Fund Family	\$100,000, \$5,000,000, or \$50,000,000, as applicable, or, in special circumstances, such lesser amount as Renaissance may permit in its discretion	\$100,000, \$5,000,000, \$50,000,000, or \$100,000,000, as applicable, or such lesser amount as Renaissance may determine
RIDA Fund Family	\$5,000,000 or \$50,000,000, as applicable, or, in special circumstances, such lesser amount as Renaissance may permit in its discretion	\$5,000,000 or \$100,000,000, as applicable, or such lesser amount as Renaissance may determine
Kaleidoscope Fund <sup>3</sup>	\$10,000 or, in special circumstances, such lesser amount as Renaissance may permit in its discretion	\$5,000 or such lesser amount as Renaissance may determine

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<sup>2</sup> For the Medallion and RIEF Fund Families, the lowest minimum initial and maintenance investment thresholds set forth above apply to employee and employee-related investors. For certain RIEF Funds and RIDA Funds, the highest minimum investment and maintenance thresholds set forth above apply to investors in particular series who receive enhanced portfolio transparency.

<sup>3</sup> The Kaleidoscope Fund is restricted to employee and employee-related investors.

## **Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss**

As stated above, Renaissance uses quantitative analysis, specifically, mathematical and statistical methods, to uncover technical indicators with predictive value. This analysis is used to construct proprietary computer models that use publicly available financial data to identify and implement trading decisions. The Firm uses these computational trading models to seek appreciation of assets through speculative trading in securities-related and futures-related financial instruments.

Within the Medallion Funds, the Firm seeks to achieve appreciation of its assets through speculative investment and trading in a variety of both securities-related and futures-related instruments. Within the RIEF Funds, the Firm trades global equity securities that are publicly traded on U.S. securities exchanges and derivatives thereon with the objective of achieving a long-term risk-adjusted return that, on a gross basis, exceeds that of the Funds' benchmark index (the Standard & Poor's 500 Index with dividends reinvested) while attempting to maintain a relatively low beta to the Index of 0.4 or lower and lower volatility than the Index. The RIEF Funds are expected to have a long-term average leverage of approximately 2.5 to 1. The RIEF Funds' trading strategy is designed with the objective that the RIEF Funds be no more than \$100 net long for each \$100 of equity. Within the RIDA Funds, the Firm trades equity securities that are publicly traded on global securities exchanges and derivatives thereon with the objective of maximizing long-term return while attempting to meet a standard deviation target. The RIEF Funds and RIDA Funds are also permitted to invest in stock index futures or stock index option contracts for risk reduction purposes. The Kaleidoscope Fund is a fund of funds that seeks to achieve capital appreciation with low volatility by investing in at least three investment vehicles sponsored by Renaissance (currently Medallion, RIEF, and RIDA).

Prospective investors in the Medallion, RIEF, and RIDA Fund Families and Kaleidoscope should be aware that their investments are speculative and volatile, involve a substantial degree of risk, and are suitable only for investors who can tolerate significant risk. Past performance is not indicative of future performance, and there is no assurance that any of the Funds will achieve their investment objectives, particularly in periods of market turmoil. Investors may experience a loss of some or all of their investments in any of the Funds, including losses amplified as a result of the Funds' use of leverage. Investors have limited liquidity rights, Fund positions and transactions will generally not be disclosed to investors, and investors do not participate in management decisions.

### **THE FOLLOWING IS A BRIEF SUMMARY OF THE MATERIAL RISKS ASSOCIATED WITH THE FIRM'S METHODS OF ANALYSIS AND INVESTMENT STRATEGIES:**

- The investment programs of the Funds are speculative and involve a high degree of risk. Certain Funds' trading can be highly leveraged, and performance can be, and currently is, volatile. There is no assurance that the Firm's computational and risk management techniques and investment decisions will protect a Fund from significant losses. In addition, there is no assurance that the Firm's analytical techniques will protect a Fund from trading losses, which could be significant and extended, if the underlying patterns of market behavior studied by the Firm (which provide the basis for its statistical models) change in ways the Firm did not anticipate.
- The Firm's strategies and trading systems make extensive use of computers. The use of a computer in collating information or in developing and operating a trading method does not assure the success of the method. A computer is merely an aid in compiling and organizing information and in executing algorithms developed by human beings. No assurance is given that the trading decisions based on computer-generated information (and/or, in certain cases, human intervention) will produce profits for the Funds. In addition, while Renaissance monitors systems and markets continuously, on occasion it may intervene in its computer trading systems: (1) in rare circumstances, including during periods of market distress, as a form of risk management when, in its view, risk is substantially higher than that perceived by the trading models; (2) to manually input corrections or updates to the data or operational parameters used by the computer system; (3) to address regulatory-related matters; (4) to address technical and operational issues in connection

with trading halts, securities delistings, corporate actions, and other events requiring technical corrections; or (5) based on other exceptional or compelling circumstances that may arise. Notwithstanding the foregoing, Renaissance retains discretion not to intervene even if a Fund's performance diverges significantly from its investment objectives. An intervention or a decision not to intervene could each negatively affect a Fund's performance or its ability to meet its investment objectives.

- The Firm's trading decisions for each Fund are based on a variety of statistical models, including forecast models, risk models, and cost models. The profitability of a Fund depends on the accuracy of the underlying forecast and cost models, and the risk control of a Fund relies on the accuracy of the risk models. No assurance can be given of the models' accuracy. Flaws in these models hinder the Funds in achieving their investment objectives.
- A Fund's trading activities and, therefore, its profitability are affected by the trading activities of other market participants. Other participants may develop (or have already developed) statistical models or trading strategies that have similarities to those used by Renaissance, which could lead to correlation in trading between the Fund and those other market participants. Any such correlation can have a negative impact on the profitability of the Fund's models, particularly when any of these market participants unwind, or partially unwind, their portfolios, as happens from time to time, including during periods of market turmoil.
- The success of a Fund's trading strategy depends on its ability to implement the trading signals generated by the Firm's models through prompt executions of orders. If the Fund is unable to obtain prompt executions at desired prices, the Fund's performance may be adversely affected.
- Many countries have been susceptible to epidemics or pandemics, such as severe acute respiratory syndrome, avian flu, H1N1/09 flu, and COVID-19. The epidemic or pandemic outbreak of an infectious disease, together with any resulting restrictions on travel, transportation, or production of goods or quarantines imposed, will likely have a negative impact on the national, regional, and global economy and business activity in some if not all of the countries in which a Fund may invest, thereby adversely affecting the performance of the Fund's investments.

A continuation or escalation of the COVID-19 outbreak could see a continual and drastic decline in global economic growth resulting in, among other things, recessions or depressions. COVID-19 led to significant volatility in the global financial markets, and COVID-19 and any future outbreak of an infectious disease or any other serious public health concern may lead to additional volatility and illiquidity of a Fund's investments, the imposition of emergency or extraordinary regulatory restrictions on markets and trading activities, and significant interruption in the normal business activity of Renaissance and the Fund's other service providers (including financial intermediaries), which could materially harm the Fund's investments and negatively affect the performance of the Fund.

- U.S. and other financial markets around the world and their participants, including the financial intermediaries through which the Funds clear or execute their transactions or have contractual relationships with, can be adversely affected by unusual market turmoil such as during the COVID-19 pandemic. A more recent example is the continuing conflict in Ukraine stemming from Russia's military invasion of Ukraine in February 2022, which resulted in the United States and other countries imposing significant, wide-ranging economic sanctions against Russia, which could result in significant market disruptions and materially impair the Funds' investment and trading activity in all impacted regions and directly affect certain financial instruments in which the Funds invest. Similarly, the war in the Middle East, which began October 7, 2023, has created and may continue to cause uncertainty and instability for market participants and could adversely affect the Funds or their financial intermediaries.
- The occurrence of any market upheavals of the type described above (as well as the ensuing market, legal, regulatory, reputational, or other consequences) is unpredictable, but if one occurs,

it can be expected to have an adverse effect on a Fund's business, trading, and performance; restrict its ability to acquire, sell, or liquidate financial instruments at favorable times or prices (thereby also restricting its ability to generate cash to fulfill redemption requests); trigger the need to post additional, and in some cases very large, amounts of collateral with financial intermediaries for extended periods of time; and impede the Fund's ability to achieve its investment objectives.

- Inflation could adversely affect the Funds' investments, the counterparties with which they deal, and the financial markets in which they pursue investments, each of which could adversely affect the Funds' performance.
- Trading in equity securities on securities markets outside of the U.S. exposes the Funds to additional risks. Non-U.S. securities markets may not be as developed, liquid, or efficient as those in the U.S., and equity securities of non-U.S. issuers may be less liquid and their prices more volatile than comparable securities of U.S. issuers that are traded on U.S. exchanges. Additional risks include market closures for extended periods of time; trading halts; circuit breakers; freezing of accounts; withholding of proceeds from dividends, corporate actions, or profits; or other governmental or regulatory actions or sanctions such as the imposition of limitations or restrictions on trading certain instruments, which can occur abruptly and without guidance. Non-U.S. markets and non-U.S. issuers of securities may be subject to different regulations than are U.S. markets and issuers. Custodial and brokerage expenses, as well as margin requirements, for transactions in non-U.S. equity securities may be higher than for transactions in U.S. securities. Since non-U.S. securities are often purchased with and payable in foreign currencies, the value of these assets as measured in U.S. dollars may be affected by changes in currency rates and exchange control regulations.
- Securities, futures, forwards, and other derivatives thereon cannot always be liquidated at the desired price. In particular, it is difficult to execute a trade at a specific price when there is a relatively small volume of buy and sell orders in a market. Market disruptions, which may occur when governments take or are subject to political actions that disrupt the markets in their currency, financial instruments traded in their jurisdictions or related to issuers under their authority, or their major exports, can also reduce market liquidity. Disruptions that may reduce market liquidity may also occur when exchanges impose trading halts, circuit breakers, or other trading limitations or restrictions. Periods of market illiquidity occur from time to time, and the events that trigger them are difficult to predict. The size of the positions acquired in any instruments, as well as the size of the trading accounts controlled by Renaissance, may also increase the risk of illiquidity. There can be no assurance that market illiquidity will not cause losses for the Funds.
- The prices of securities and of futures, forwards, and other derivatives are subject to unpredictable changes, which can be rapid and substantial. Such changes may result from, among other things, changing supply and demand relationships; changes in national and international interest rates, rates of inflation and deflation, and currency controls; stock-loan availability; exchange requirements; currency fluctuations; U.S. and foreign political and economic events; changes in government trade, fiscal, economic, and monetary policies and programs; devaluations and revaluations of financial instruments; changing sentiments of the marketplace; and other world events, including without limitation the outbreak of epidemics or pandemics, natural disasters, terrorist attacks, or military conflicts. Governments and regulators from time to time intervene (often with limited or no advanced notice or information), directly and through regulation, in certain markets, often with the intent to influence prices. For example, in response to market conditions resulting from the COVID-19 pandemic, various regulators imposed (and may in the future impose) limits or prohibitions on engaging in short sales, potentially impeding a Fund's ability to fully execute its trading strategy. Governments or applicable regulatory authorities can also close markets or limit their hours of trading unexpectedly or with limited notice. These factors could result in substantial losses for the Funds.
- In addition, the Funds' financial intermediaries may encounter financial difficulties that could impair the Funds' operational capabilities or capital positions. If one of a Fund's financial intermediaries

becomes insolvent, bankrupt, or unable to satisfy creditor claims, deliver assets in its custody, or execute transactions, the Fund will be subject to various risks of loss, the nature of which will vary depending on the financial intermediary's role, which may include without limitation, acting as a prime broker, an FCM, a securities lending counterparty, and/or a swap counterparty. The adverse consequences for a Fund of a financial intermediary's financial deterioration may be more severe if the Fund has multiple relationships with the financial intermediary acting in one or more of the capacities described above. This risk is magnified if the Fund deals with a financial intermediary and one or more of its affiliates, with multiple affiliates acting in different capacities. An additional layer of complexity is added if the various relationships involve multiple products with different insolvency treatments or service providers and counterparties in non-U.S. jurisdictions. Funds that conduct business with non-U.S. counterparties may also not be afforded certain of the protective measures provided by U.S. laws and regulations. Multiple relationships can make it more difficult for the Fund to recover assets from or assert claims against the financial intermediary and its affiliates. The Funds rely on third parties to regularly assess counterparties' creditworthiness and generally do not have access to information to enable them to anticipate the financial deterioration of a particular financial intermediary. Any financial difficulties experienced by a financial intermediary can affect its creditworthiness and prevent it from performing services for a Fund, which can impair the Fund's ability to execute and settle transactions.

- When permitted by law, the Funds may enter into privately negotiated derivatives transactions with counterparties that are based on the performance of underlying reference assets, including total return swaps based on the performance of certain equity securities. Derivatives trading involves several risks, some of which depend on whether the derivative is cleared with a central clearing party (i.e., a clearinghouse) as mandated by various regulatory regimes. Risks associated with cleared swaps are similar to those associated with futures contracts. If a clearinghouse used by a Fund is unable to meet its obligations for financial or other reasons, this could have a significant and adverse effect on the Fund, including causing substantial losses. Uncleared swaps or derivatives involve additional risks, including the risk of loss of the amount expected to be received under a swap or derivative in the event of the counterparty's refusal or inability to perform. The Fund is subject to risks relating to the creditworthiness and possible insolvency of the counterparties and general market, liquidity, and operational risks that may affect them, the risk of adverse changes in market conditions, and the risk of substantial costs for creating and maintaining the transaction.
- The Firm manages various Funds using materially different trading strategies. Inevitably, one Fund's trading will have some impact on another's. The Firm imposes periodic checks to attempt to ensure that the cross-impact of Medallion's trading is not materially adverse to the trading of the non-Medallion Funds. To the extent that a material impact is detected, the Firm will attempt to address it by adjusting the trading of Medallion and/or one or all of the other Funds, which could have a negative effect on a Fund's activities. Furthermore, if two Funds are seeking simultaneously to trade opposite each other in the same instrument, the Firm's cross-trading procedures delay the execution of the trade for one Fund under a prearranged algorithm.
- If a Fund and any other Firm-sponsored investment entity attempt to place orders in the same instrument, in the same direction, and at the same time, the Firm's systems do not combine the orders but randomly allow one order to go first, thus allowing one trading entity to enter the market before the other. In addition, the Firm has no control over the timing or manner in which orders are filled, and therefore, an order that enters the market first may not be filled first, may not be filled at all, or may be filled at a better or worse price. The Firm does not engage in post-trade allocations among orders placed by a Fund and any other Firm-sponsored investment entity.
- Changes in existing law and government regulations can adversely affect the returns of the Funds or their ability to conduct business. Such changes are beyond the Funds' control and can occur quickly. For example, in response to volatile markets, a number of regulators, particularly in non-U.S. markets, have imposed (and may in the future impose) limits or prohibitions on engaging in short sales, potentially impeding a Fund's ability to fully execute its trading strategy. Separately,

governments and regulators may, for reasons unrelated to volatility, limit or flatly prohibit trading in specific instruments or classes of instruments or on certain markets or exchanges generally or may limit or prohibit trading by certain types of entities, such as the Funds, all of which could adversely affect the business, trading, and profitability of a Fund. The implementation of trading restrictions or other changes in laws or regulations (particularly in non-U.S. jurisdictions) can occur abruptly and with limited or no information about how to interpret such changes, which can result in confusion in the markets. In addition, new interpretations of existing laws and regulations might make a Fund a target of regulatory suits or proceedings.

A second example involves the London Interbank Offered Rate ("LIBOR"), which as of January 1, 2024, is no longer published for any financial instrument. While the financial instruments in which the Funds trade and invest generally do not use LIBOR as a reference rate, the discontinuation of LIBOR has the potential to, among other things, result in uncertainty as to the value of a reference rate or the functioning, liquidity, or value of certain financial contracts; regulatory actions that adversely affect certain markets or specific financial contracts; or adverse ramifications for a Fund's financial intermediaries, all of which could have a negative impact on a Fund's performance or profitability. While to date, none of those have occurred in a manner that has had an impact on the Funds, there is no assurance that this will continue to be the case.

In recent years, new laws and regulations have provided additional oversight of financial markets around the globe. These include more stringent registration and disclosure requirements and other heightened oversight requirements for private investment funds and their advisers; additional or increased restrictions with respect to certain trading techniques and related financial instruments (e.g., short sale restrictions, clearing and trading of over-the-counter derivatives, and enhanced speculative position limits); potential changes in the tax treatment of U.S. and non-U.S. investment vehicles and their advisers; the creation of a single systemic risk regulator with oversight and authority over substantially all of the U.S. financial system; and other substantial changes in the broader legal and regulatory framework in which such funds operate. Many of these changes are found in the Dodd-Frank Act. While many provisions of the Dodd-Frank Act have become effective, some important implementing rules and regulations (including many relating to security-based derivatives) have not yet become effective, so their full impact is unknown. The regulation of private investment vehicles and their transactions is also subject to future modification by further legislative, executive, or regulatory action as well as judicial review.

In addition, federal, state, local, or foreign regulations may impose reporting or other disclosure requirements relating to, among other things, type of security, position size, or issuers in particular industries. These requirements may impose an onerous administrative burden on a Fund or require the disclosure of confidential information. As a result, a Fund may initiate certain holding limits or reduce the size of certain positions, actions it would not take absent the need to comply with or address the impact of these regulations.

- Most of the Funds' positions are expected to have or be based on publicly available prices; however, in certain circumstances, there may be no independent valuation source available, in which case the Firm will apply a different valuation with a view towards reaching a commercially reasonable result. There is no assurance that all such valuations will be correct or even available at any given time.
- The Firm uses various risk control measures – including adjustments to reserves and regular monitoring of financial intermediaries – to attempt to reduce market, counterparty, and other risks. There is no assurance that these risk control measures will be successful. In addition, the Firm engages in hedging activities to attempt to reduce various risks, and the RIEF Funds and RIDA Funds may from time to time use stock index futures or stock index options for the purpose of risk reduction. There is a substantial risk, however, that such hedges will not be effective in limiting losses. In fact, such hedges could result in a substantial loss, notwithstanding the fact that they were intended to reduce risk. Many hedging instruments can encumber a small amount of cash relative to the magnitude of the risk assumed. Furthermore, many hedging instruments may result

in a loss if the other party to the transaction does not perform as promised. Moreover, governmental actions that inhibit a Fund's ability to engage in certain transactions can impede a Fund's ability to hedge its investments.

- The Funds' relationships with their financial intermediaries are governed by negotiated agreements that can be amended or terminated, including upon the occurrence of a variety of events such as the Fund's bankruptcy, failure to maintain required regulatory licenses or registrations, failure to deliver specified reports, or failure to meet certain tests related to net asset value. If such an event occurs, the counterparty may have the ability to immediately terminate the relationship or change certain terms of the agreement, such as applicable financing rates. Any such termination or amendment can have an adverse effect on the Fund's ability to continue to trade with that financial intermediary or on the profitability of the Fund.
- Investors may also incur tax-related risks and should discuss such risks with their tax advisers. Investors in a Fund may be required to report taxable income for one or more years that differs from their pro rata share of the economic income of the Fund. Renaissance identified questions related to certain investments by certain private foundations associated with individuals affiliated with the Firm that may give rise to potential excise tax liability for applicable Funds. The Firm consulted with outside counsel and engaged with the IRS regarding this matter without resolution. Certain current and former directors of the Firm have made commitments to bear the cost of any potential tax liability that may be imposed.
- The Funds rely on the Firm's information technology and data management systems and those of their service providers. These systems can fail or be subject to interruption, damage, or destruction caused by natural or man-made occurrences, such as extreme weather, fires, or earthquakes; quarantines and other mobility or access restrictions; widespread or prolonged loss of access to key personnel; power loss or computer, network, or telecommunications failures; usage errors by personnel; infiltration by unauthorized persons, including cyberattacks (some of which may not be detected for an extended period of time and some of which could be massive attacks aimed at a country's critical infrastructure and economic systems); and terrorist attacks and other intentional acts of destruction. Any failure, interruption, or destruction of or damage to the Firm's or a service provider's information technology or data management systems could have a material adverse impact on the Funds' operations, including impairing their financial performance, and result in the theft, disclosure, or loss of proprietary, confidential, or other sensitive information.
- If certain hardships or other extraordinary circumstances exist, including but not limited to substantial redemptions that the Firm believes would have a significant adverse and/or a significant and disproportionately unfair effect on nonredeeming investors or the Funds, the Firm may, in whole or in part, suspend or delay redemptions or delay redemption payments until such time as the Firm determines that such hardships or other extraordinary circumstances no longer exist.
- Under extraordinary circumstances, the Funds may find it necessary to establish a reserve for liabilities (contingent or otherwise) or withhold a portion of an investor's proceeds at the time of redemption from the Fund, in which case the reserved or withheld portion would remain at the risk of the Fund's activities. Such reserved or withheld amounts may be required to be maintained for a substantial period of time until the Firm determines that they are needed to cover liabilities or that removal of those reserves or withheld amounts (in whole or in part) is appropriate and in the best interest of the nonredeeming investors.

**FOR A MORE COMPREHENSIVE DISCUSSION OF RISKS APPLICABLE TO A FUND, ELIGIBLE INVESTORS SHOULD REFER TO THE FUND'S OFFERING MEMORANDUM.**

Each of the Fund Families encounters a specific set of risks based on its style of trading and investment objectives.

**Medallion:**

- High Portfolio Turnover – The Medallion Funds may be subject to a high portfolio turnover rate, which can be expected to result in high transaction costs, which in turn can be expected to adversely affect the Funds' performance.
- High Leverage – The Medallion Funds may borrow, either directly or indirectly, to finance the acquisition of securities and will secure such borrowings with their assets. The amount of borrowing will vary and cannot be estimated. Leveraging enhances the ability of the Funds to acquire securities but also increases their potential exposure to losses.

ETPs – The Medallion Funds invest in ETFs, ETNs, and ETCs ("ETPs"). ETFs represent shares of ownership in either funds or unit investment trusts that hold portfolios of common stocks, bonds, cryptocurrency, or other instruments and are generally designed to correspond to the return of the relevant benchmark asset(s). In contrast, ETNs do not constitute an actual investment portfolio or actual assets and are unsecured debt obligations issued by financial institutions that are designed to track the return of an index or underlying asset such as a commodity or currency. ETNs intended to track individual commodities or commodity indices are known as ETCs (hereinafter, references to "ETNs" include ETCs). The primary risks associated with ETPs are as follows: (1) ETPs may be unable to precisely replicate the performance of the index or assets to which they are linked as a result of expenses and other factors; (2) ETPs are subject to market risk due to unfavorable fluctuations in the market price of the underlying assets or index components; and (3) ETPs that are exposed to non-U.S. markets or instruments involve the risk of capital loss from unfavorable fluctuations in currency values, differences in generally accepted accounting principles, or economic or political instability in other nations. ETNs are exposed to certain additional risks as follows: (1) unlike ETFs, ETNs are unsecured debt obligations and are subject to the risk of the issuer's insolvency; (2) ETNs are generally less liquid than ETFs, can have wider bid-ask spreads, and may be more vulnerable to market volatility; (3) substantial discrepancies between an ETN's market price and its indicative value (based on underlying reference net asset values) could result in losses to investors that purchase at a substantial premium to the indicative value; and (4) ETNs may be mandatorily redeemed at a price below an investor's original purchase price upon the issuer's (or a counterparty's) insolvency.

Spot bitcoin ETFs involve specific risks because they are relatively new and the underlying cryptocurrency held by these ETFs is a highly speculative and volatile asset. Investing in spot bitcoin ETFs thus is also highly speculative and volatile. The performance of spot bitcoin ETFs will not reflect the specific return an investor would realize if the investor actually held or purchased bitcoin directly. The differences in performance may be due to factors such as fees, transaction costs, and index tracking risk.

All spot bitcoin ETFs currently approved for trading are limited to engaging in "cash" creations and redemptions as opposed to in-kind creations and redemptions. This means that when an authorized participant wishes to create new shares of spot bitcoin ETFs, it must deliver cash to the ETF issuer in exchange for such shares, and the ETF issuer then purchases bitcoin. Conversely, when shares are redeemed by authorized participants, the ETF issuer will sell bitcoin for cash and deliver the cash to the authorized participant. The use of cash creations and redemptions, as opposed to in-kind creations and redemptions, may cause the price of the shares of a spot bitcoin ETF to fall or diverge from the shares' net asset value more than would otherwise be the case. This may adversely affect a Fund's investment in spot bitcoin ETFs (and could also adversely affect the Fund's investment in bitcoin futures).

Bitcoin futures ETFs and ether futures ETFs involve specific risks. Bitcoin, ether, and futures contracts based on bitcoin or ether are extremely volatile, and investment results are expected to vary substantially over time. Investing in ETFs based on bitcoin futures or ether futures thus is also extremely speculative. In addition, there is significant continuing regulatory uncertainty regarding the status of ether under the federal and state securities laws.



- Bitcoin and Ether – The Medallion Funds currently trade in bitcoin futures and shares of ETFs that hold bitcoin and bitcoin futures. The Funds are also authorized to trade other CFTC- and SEC-approved and regulated instruments that derive their value from other cryptocurrencies, such as ether futures and ether futures ETFs. Although spot ether ETFs are not currently approved for trading on U.S. securities exchanges, they will be available for the Funds to trade if they are approved for trading in the future. Financial instruments that derive their value, in whole or in part, from bitcoin or ether are extremely volatile, and investment results in these instruments are expected to vary substantially over time. These instruments involve substantially more risk and potential for loss than financial instruments, such as stocks, bonds, and derivatives referencing more conventional asset classes and are substantially more speculative and significantly more likely to result in a total loss of capital than many other investments. The following is a nonexclusive list of risks associated with bitcoin and ether, each of which could adversely affect the value of those financial instruments traded by the Funds the value of which is derived, in whole or in part, from bitcoin or ether: (1) bitcoin and ether's limited history; (2) the absence of recognition of bitcoin and ether as legal tender by most governmental authorities; (3) the lack of any central authority to issue or control bitcoin and ether; (4) their vulnerability to cyberattacks by malicious actors or botnets; (5) their susceptibility to forking; (6) the adverse effects of periodic occurrence of "halving" on bitcoin; (7) the possibility that the consent mechanisms used by bitcoin's or Ethereum's blockchain to confirm transactions will be criticized by governments and others and subject to restriction; (8) the possibility that certain protocols or code underlying bitcoin's or ether's distributed ledger network could be subject to intellectual property rights claims; (9) bitcoin's and ether's substantial price volatility; (10) their possible correlation to the price volatility of cryptocurrencies and other distributed ledger assets; (11) the susceptibility of bitcoin and ether spot exchanges to the risk of fraud, manipulation, and other malfeasance; (12) the undeveloped and evolving nature of bitcoin and ether regulation; (13) the enhanced basis risk in bitcoin futures compared to other types of investment vehicles; (14) the possibility of exchanges' or FCMs' imposing other requirements or limitations on bitcoin futures trading; and (15) increased regulatory scrutiny of participants in the crypto space that invest in bitcoin futures. Any of these factors could materially and adversely affect the value of the Funds' investments.

#### **RIEF:**

- Market Exposure – The RIEF Funds' models attempt to keep the RIEF Funds' predicted beta to the Standard & Poor's 500 Index (with dividends reinvested) at 0.4 or lower. The Funds' success at achieving a realized beta of 0.4 or lower over the long run depends on the accuracy of the Funds' beta models, which, in recent volatile markets, have not performed as expected. During such times, there have been, and in the future may be, periods when the Funds' beta to the Index is higher than 0.4. Furthermore, given the RIEF Funds' tendency to have positive beta, they may be exposed to losses in times of general market downturns and declining prices of equity securities.
- Use of Leverage – The RIEF Funds' leverage is expected to run with long-term average leverage of approximately 2.5 to 1; however, leverage varies, and the RIEF Funds have experienced leverage both higher and lower than 2.5 to 1. The RIEF Funds endeavor to keep leverage below 3 to 1, but in certain circumstances, such as in recent volatile markets, the RIEF Funds' leverage has exceeded 3 to 1 and may do so in the future.
- Net Long Strategy – The RIEF Funds' trading strategy is designed to keep the Funds no more than 100% Net Long, i.e., no more than \$100 net long for each \$100 of equity. The Funds are expected to usually be approximately 100% Net Long except in periods of high market volatility, when they are more likely to be less than 100% Net Long. Nevertheless, the Funds may sometimes be materially greater than 100% Net Long even in periods of high volatility or materially less than 100% Net Long even in periods of low or typical market volatility.
- Long Holding Periods – The RIEF Funds' portfolio is regularly exposed for long periods of time to market risks with respect to particular positions held. Given that market movements are more

difficult to predict over the long term than in the short term, these long holding periods exacerbate the potential risk of loss.

- Position Size – The RIEF Funds hold significant individual positions. Such large positions can be difficult to exit quickly without affecting their prices.

**RIDA:**

- Market Exposure – The RIDA Funds expect most returns over the long term to come as alpha as the Funds are intended to have low correlation to the U.S. and global equity markets. There can be no assurance that this objective will be achieved. The beta models in recent volatile markets have not performed as expected.
- Standard Deviation – The RIDA Funds operate with an empirical standard deviation target selected by the Funds that is neither less than 8% nor more than 16% per annum. There can be no assurance that this standard deviation target will be met. The target is not a guarantee or prediction of performance.
- Long Holding Periods – The RIDA Funds' portfolio is regularly exposed for long periods of time to market risks with respect to particular positions held. Given that market movements are more difficult to predict over the long term than in the short term, these long holding periods exacerbate the potential risk of loss.
- Position Size – The RIDA Funds hold significant individual positions. Such large positions can be difficult to exit quickly without affecting their prices.

**Kaleidoscope:** For a description of the risks specific to the Kaleidoscope Fund, see the risk factors set forth above for Medallion, RIEF, and RIDA.

**THE FOLLOWING IS A BRIEF SUMMARY OF THE MATERIAL RISKS ASSOCIATED WITH INVESTMENT PRODUCTS TRADED BY THE FUNDS. FOR A MORE COMPREHENSIVE DISCUSSION OF RISKS APPLICABLE TO A FUND, ELIGIBLE INVESTORS SHOULD REFER TO THE FUND'S OFFERING MEMORANDUM.**

Risks to trading in **equities** include but are not limited to the following:

- Securities Lending Agreements – These arrangements present counterparty credit risk, including insolvency, and the risk of counterparty default. In addition, the Funds have no control over how counterparties process and allocate fulfillment of requests to borrow securities.
- Currency Fluctuations and U.S. Dollar-Denominated Securities – Issuers of U.S. dollar-denominated securities are subject to currency fluctuations between the value of the U.S. dollar and the other currencies in which they transact business.
- Short Sales – A short sale involves a theoretically unlimited risk of an increase in the market price of securities sold short. Limitations or bans on short selling impede the Funds' ability to fully execute their trading strategies. The risks of short selling are also increased by lenders' ability to "re-call" securities borrowed by the Funds, as well as actions aimed at creating a "short squeeze" by increasing the price of specific securities for which there are known or perceived substantial short positions across the market.
- Effect of Redemptions – Significant redemptions necessitating a substantial reduction of portfolio positions in equity securities could make the remaining portfolio less liquid and more expensive to liquidate.

- Options – Sellers of uncovered call options assume the risk of a theoretically unlimited increase in the market price of the underlying security while sellers of uncovered put options assume the risk of a decrease in the market price of the underlying security possibly to zero. Buyers of options risk losing their entire investment.

Risks related to trading in **futures, forwards, and other derivatives** include but are not limited to the following:

- Margin and Leverage – Low margin deposits normally required in futures (and options) trading permit an extremely high degree of leverage, which may result in gains or losses, including losses in excess of the amount invested by the Funds. Trading on a leveraged basis in volatile markets necessarily involves a substantial risk of sudden, significant losses.
- Position Limits – The CFTC has established position limits with respect to certain futures contracts traded on exchanges in the United States and with respect to swaps that are deemed to be economically equivalent to such futures contracts. U.S. exchanges and non-U.S. futures markets may also establish position limits. Insofar as such limits exist, all commodity accounts owned, held, controlled, or managed by Renaissance and its principals and affiliates may be required to be combined (that is, aggregated) for position limit purposes, thus potentially impairing Renaissance's trading activities.
- No Intrinsic Value of Positions – Futures, forwards, and other derivatives have no intrinsic value and are typically not settled with actual delivery of a tangible asset or evidence of ownership such as an equity security. Although the performance of a derivative derives from or depends on the performance of the underlying referenced asset, the relationship between the derivative and the underlying referenced asset is not necessarily constant. The price or value of the underlying instruments could rise or fall significantly and the economy could prosper or falter, and this would not necessarily correlate to whether the derivatives in a Fund's portfolio are profitable or unprofitable.
- Non-U.S. Futures Trading – Trading foreign futures presents increased risks of adverse exchange-rate movements between the U.S. dollar and the functional currencies of futures contracts (which are also influenced by governmental controls, restrictions, or limitations on the underlying currency or the ability to settle transactions in those currencies), the absence of a clearinghouse system, and counterparty nonperformance.
- Lack of Segregation of Assets by FCMs – If an FCM fails to segregate customer funds, there is a risk of loss in the event of the FCM's bankruptcy.
- Daily Price Fluctuation Limits – U.S. commodity exchanges may limit fluctuations in futures contracts during a single day by regulations referred to as "daily price fluctuation limits" or "daily limits." During a single trading day, no trades may be executed at prices beyond the daily limit. Once the price of a particular commodities futures contract has increased or decreased to the limit point, positions in the commodities futures contract can be neither established nor liquidated unless traders are willing to effect trades at or within the limit. Futures prices can move and have moved the daily limit with little or no trading for consecutive days. Similar occurrences could prevent a Fund from promptly liquidating unfavorable positions and subject the Fund to substantial losses that could exceed the margin initially committed to such trades.
- Credit Default Swaps ("CDS") – If a Fund is a buyer under a CDS and no credit event occurs, the Fund may lose its investment and recover nothing; if it is a seller under a CDS, it is exposed to a risk of loss if a credit event occurs that could be worse than the loss it would have suffered if it had owned the obligations of the defaulting reference entity directly.

Risks of **fixed-income** trading include but are not limited to the following:

- Interest Rate Fluctuations and Credit Ratings – The value of fixed-income securities in which the Funds invest and trade will generally change as interest rates fluctuate in the relevant financial markets, in addition to being affected by such factors as credit risk and financial condition relating to particular issuers. Generally, when interest rates decline, the value of any long fixed-income portfolio held by a Fund can be expected to rise while that of any short fixed-income portfolio can be expected to decline. Conversely, when interest rates rise, the value of a long fixed-income portfolio can be expected to decline while that of a short fixed-income portfolio can be expected to rise. Also, credit ratings may not fully reflect the risks inherent in the relevant security, and a given issuer may suffer a decline in its rating, leading to loss.
- Inflation-Indexed Securities – These securities are fixed-income securities whose principal value is periodically adjusted to reflect the rate of inflation. An investment in an inflation-indexed security may implicate certain risks that are different from those associated with an investment in other fixed-income securities. Specifically, the principal value of an inflation-indexed security will be adjusted downward if the relevant index that measures inflation for that instrument falls. Consequently, the interest payable on those securities (calculated with respect to a smaller principal amount) will be reduced. In addition, although repayment of the original principal upon maturity (as adjusted for inflation) is guaranteed in the case of U.S. Treasury inflation-indexed securities such as Treasury Inflation-Protected Securities, which some Funds currently trade, for other inflation-indexed securities that do not provide a similar guarantee, the adjusted principal value repaid at maturity may be less than the original principal value. Accordingly, in certain economic environments, such as periods of significant deflation, inflation-indexed securities may experience materially poorer performance relative to other fixed-income securities with similar durations the principal values of which are fixed and are not adjusted downward to reflect deflation. In addition, the market value of inflation-indexed securities is expected to change in response to changes in “real” interest rates. Real interest rates are tied to the relationship between nominal interest rates and the rate of inflation. For example, if an investment provides a nominal return of 5% in a given year and inflation is 2% during that period, the inflation-adjusted, or “real,” return is 3%. If there are periods when interest rates increase at a faster rate than inflation, real interest rates may rise, thus leading to a decrease in the market value of inflation-indexed securities. During such periods, the decrease in the market value of inflation-indexed securities may be more pronounced than any decrease in the market value of other fixed-income securities.
- Mortgage-Related Securities, Mortgage-Backed Securities, Asset Backed Securities, and Other Structured Credits – These investments involve the general risks typically associated with investing in traditional fixed-income securities and certain additional risks, such as principal prepayment, fluctuations in interest rates, price and yield volatility, risks affecting underlying assets, and counterparty failure. Changes in the federal government's role with respect to government-sponsored enterprises and other government actions in the mortgage market more generally may negatively affect the value of and returns on these securities.
- Possibility of Reduced Liquidity – Fixed-income securities traded over the counter may be less liquid and have the potential for wider bid-ask spreads, impairing the Firm's ability to sell such instruments rapidly and/or at favorable prices or, in certain circumstances, at all.
- Repurchase and Reverse Repurchase Agreements – These instruments increase the risk of loss due to the use of leverage and potential counterparty nonperformance. The Funds rely on third parties to assess the creditworthiness of counterparties.
- Hybrid Instruments – These instruments combine features of a fixed-income security with those of a derivatives contract and entail both credit risk and the risk of nonperformance of the issuers of the hybrid instruments.

## **Item 9: Disciplinary Information**

The Spanish National Securities Markets Commission (the “CNMV”) determined that, in 2017, Renaissance on behalf of its funds traded in violation of a Spanish short selling ban on the securities of Liberbank, S.A. (“Liberbank”). Although Renaissance had not engaged in any short sales of Liberbank, the CNMV determined that Renaissance’s reduction of long positions in Liberbank violated the short sale ban because it resulted in an increase in the funds’ net short position in Liberbank. Renaissance’s appeal of the CNMV’s determination to the Spanish Ministry of Economy and Enterprise was rejected on April 1, 2019. Renaissance paid the CNMV a fine equal to 150,000 euros on June 26, 2019. (The monetary fine as noted in Form ADV Part 1A was converted into U.S. dollars using the exchange rate on the date of payment.) Renaissance’s appeals to the Spanish National High Court and the Spanish Supreme Court were rejected on June 18, 2020, and July 7, 2021, respectively.

On April 22, 2021, the Swedish Financial Supervisory Authority (Finansinspektionen) determined that Renaissance had not timely filed notifications with respect to net short positions held by Renaissance-managed funds in a specific Swedish listed security (“Short Notifications”) and imposed a fine of SEK 1,000,000. Renaissance had self-reported to Finansinspektionen in September 2017 that it had failed to timely file these Short Notifications on multiple occasions in 2016 and 2017. The failure was due to a coding error related to an ambiguity as to whether transactions in that particular security were exempt from reporting following a corporate transaction by the issuer. Renaissance detected the error in connection with a routine review and corrected it. Renaissance paid the fine on May 17, 2021. (The amount of the fine as noted in Form ADV Part 1A (USD 120,457) was converted into U.S. dollars using the exchange rate on the date of payment.)

#### **Item 10: Other Financial Industry Activities and Affiliations**

Renaissance is registered with the Commodity Futures Trading Commission ("CFTC") as both a commodity pool operator and a commodity trading advisor. It is a member of the National Futures Association ("NFA"). Certain management persons are registered with the NFA as associated persons and/or principals of Renaissance.

RIM, a wholly owned subsidiary of Renaissance, is a broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority, Inc. RIM currently is the exclusive placement agent for the private placements of securities in the RIEF and RIDA Fund Families.

Nathaniel Simons, a Renaissance director and minority owner, is also the Chairman and a Senior Managing Director of the general partner of Meritage Group LP ("Meritage"), a registered investment adviser that serves as investment manager and/or general partner to certain private investment funds. Investors in Meritage funds include a number of persons associated with Renaissance. Renaissance provides certain administrative and operational services to Meritage and its affiliates. Renaissance also serves as a third-party administrator to certain of Meritage's private investment funds. Meritage pursues investment strategies that are generally fundamentally-oriented and longer-term in their investment horizon involving public and private equity, credit, and real estate, and has broad discretion to invest in other investment instruments and to employ other strategies in pursuing the objectives of its private investment funds, according to its most recent Form ADV. Renaissance's investment strategies include features that overlap in part with certain limited investment activities at Meritage, although, according to Mr. Simons, he does not actively participate in the technical aspects of such overlapping activities. As a director of Renaissance, Mr. Simons currently receives certain non-technical information about Renaissance's investment strategies, but he does not have any active involvement in Renaissance's investment or trading activities.

Pursuant to a services agreement, the Firm provides certain administrative and operational services to Meritage and certain of its related entities. Pursuant to a fund administration agreement, Renaissance acts as administrator for the private investment funds managed by Meritage and its affiliates. As administrator, Renaissance is responsible for certain day-to-day administrative functions of the private investment funds.

Pursuant to administrative services agreements, Renaissance serves as the administrator to those Medallion Funds organized in Bermuda. As administrator, Renaissance is responsible for certain day-to-day administrative functions of such Medallion Funds, which include, without limitation, investor relations and fund accounting functions.

Renaissance and certain of its related persons act as sponsor, general partner, managing member, and/or investment manager/adviser of pooled investment vehicles, which are part of the master-feeder fund structures discussed above.

#### **Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading**

Renaissance has adopted a Code of Ethics ("Code") pursuant to Rule 204A-1 under the Investment Advisers Act of 1940 that is applicable to employees of Renaissance and its subsidiary RIM ("Employees"). The Code and other written policies set forth in the Firm's Code of Ethics and Compliance Manual require Employees to exercise their authority and responsibility for the benefit of clients and to refrain from activities that may conflict with the interests of clients, including, among other things, policies and procedures that do the following:

- prohibit trading on the basis of material nonpublic information;
- prohibit Employees from taking personal advantage of opportunities belonging to clients;
- place limitations on personal trading by Employees (and related persons) and impose reporting obligations with respect to such trading;
- require Employees (and related persons) to obtain preclearance of transactions in private placements;
- prohibit Employees (and related persons) from participating in initial public offerings;
- impose limitations on the giving or receiving of gifts and entertainment;
- place limitations on political contributions by certain Employees (and related persons) and impose reporting obligations with respect to such contributions pursuant to "pay to play" rules; and
- restrict Employees' outside business activities.

The Chief Compliance Officer monitors compliance with these and all other aspects of the Code and related Firm policies.

The Firm will provide a copy of the Code to a client or prospective client upon request.

Renaissance and RIM seek investors to invest in Funds in which Renaissance and its related persons also invest and for which Renaissance and its related persons serve as general partner, managing member, or investment manager. In addition, because certain of the Funds advised by Renaissance invest in accordance with their investment objectives in other Funds for which Renaissance or its related persons act as general partner, managing member, and/or investment manager, Renaissance may be deemed to be recommending to such Funds that they buy securities in which Renaissance has a financial interest and/or securities that Renaissance also buys for itself (i.e., securities in other Funds). A particular Fund's relationship to other Funds advised by Renaissance is disclosed in such Fund's offering materials.

Employees (and related persons) may invest to a limited extent in the same securities recommended for the Funds and the Account, subject to significant personal trading restrictions, including as applicable (1) an account approval requirement, (2) an account reporting requirement, (3) a preclearance requirement, (4) a holdings and transaction disclosure requirement, (5) a holding period requirement, and (6) a trading ban with respect to certain instruments. Exceptions may be granted only with the approval of the Firm's Chief Compliance Officer.

Renaissance's Employees (and related persons), as described above, are subject to significant personal trading restrictions, including, if applicable, a holding period requirement. This, coupled with the Firm's style of trading (described above in both Item 4, Advisory Business, and Item 8, Methods of Analysis, Investment Strategies, and Risk of Loss), reduces the risk of an Employee's (or a related person's) trading securities for a personal account at or around the same time that a Fund is trading the same securities.

## **Item 12: Brokerage Practices**

In selecting broker-dealers to execute transactions for its clients, the Firm seeks the best available overall terms, based on a variety of factors, including the ability to achieve prompt and reliable executions at favorable prices; the operational efficiency with which transactions are effected; the competitiveness of commission rates; the securities lending arrangements available from the broker; and the financial strength, integrity, and stability of the broker. Recognizing the value of these factors, Renaissance may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction or series of transactions. Renaissance regularly evaluates the placement of brokerage and the reasonableness of commissions paid. However, the Firm is not obligated to solicit competitive bids or seek the lowest available commission costs.

Renaissance does not currently receive any form of "soft dollar" compensation from its brokers and will use its best efforts to avoid receiving any in the future. To the extent that any "soft dollar" compensation is received, it will be in compliance with Section 28(e) of the Securities Exchange Act of 1934, as amended, and its receipt will be disclosed to investors.

The Firm does not consider client or investor referrals in selecting or recommending broker-dealers.

The Firm does not recommend, request, require, or permit clients to direct brokerage.

Renaissance does not aggregate orders across client accounts. The Firm operates the models for each of its Fund Families independently from one another. Separate machines are assigned to each Fund Family, and they do not interact with each other.

The Firm follows procedures designed to allocate trading opportunities fairly and equitably among the various Fund Families that it manages. If a Fund and any other Firm-sponsored investment entity attempt to place orders in the same instrument, in the same direction, and at the same time, the Firm's systems do not combine the orders but randomly allow one order to go first, thus allowing one trading entity to enter the market before the other. In addition, the Firm has no control over the timing or manner in which orders are filled, and therefore, an order that enters the market first may not be filled first, may not be filled at all, or may be filled at a better or worse price. The Firm does not engage in post-trade allocations among orders placed by a Fund and any other Firm-sponsored investment entity.



### **Item 13: Review of Accounts**

Renaissance monitors compliance with the investment objectives of its clients at weekly meetings attended by the most senior staff of its Research, Production, Research Infrastructure, and Data departments. At these meetings, the previous week's performance and any matters that led to system adjustments may be reviewed and discussed. Proposed enhancements and changes in the Firm's computerized models are reviewed and approved when appropriate.

The Firm reviews client accounts on a periodic basis as set forth above. Additional reviews may be conducted at the request of senior management.

Investors in all Fund Families and the Kaleidoscope Fund receive monthly reports, which include Fund performance information and information about an investor's individual investment in such Fund. The reports are available on the investor website and upon request. In addition, investors in the RIEF and RIDA Fund Families have access to weekly Fund performance updates, monthly assets under management information, and monthly commentaries. Subject to certain enhanced confidentiality obligations and higher minimum investment requirements, investors in certain series of the RIEF and RIDA Fund Families have access to quarterly reports that include position-level transparency on a delayed basis.

All investors receive copies of the annual audited financial statements for the Funds in which they invest. Investors in the RIEF and RIDA Fund Families also receive quarterly unaudited financial statements.

**Item 14: Client Referrals and Other Compensation**

The Firm does not participate in arrangements whereby nonclients provide economic benefits to the Firm for providing investment advice or other advisory services to the Firm's clients.

As described in Item 10, Other Financial Industry Activities and Affiliations, RIM is the exclusive placement agent for the private placements of securities in the RIEF and RIDA Fund Families. In consideration of these services, the Firm pays RIM (pursuant to an Expense Sharing Agreement) for certain of RIM's expenses, plus an additional fee.

**Item 15: Custody**

The Firm may be deemed to have custody of the assets of the Funds. The Firm uses qualified custodians to maintain the assets of the Funds. It engages public accountants registered with and subject to inspection by the Public Company Accounting Oversight Board to conduct annual audits and will, in accordance with SEC rules, distribute audited financial statements (prepared in accordance with generally accepted accounting principles) to Fund investors within 120 days of the end of each fiscal year (or 180 days in the case of the Kaleidoscope Fund).

The Firm does not have custody of the Account.

The Firm produces monthly statements at the fund and investor level for the Medallion Funds, the Kaleidoscope Fund, and one fund in the RIEF Fund Family (RIEF RMP) that is designed for employee-related investors; monthly account statements for investors in the other RIEF Funds and the RIDA Funds are prepared by the Funds' administrator, The Bank of New York Mellon. Investors should carefully review their account statements. Qualified custodians for each Fund provide daily, weekly, and monthly account reports that are presented for review and reconciliation with the Firm's records.

**Item 16: Investment Discretion**

Subject in certain instances to restrictions contained in its investment management agreements described below, Renaissance will ordinarily be granted discretionary authority to determine the type and amount of securities to be purchased or sold for the Funds and Account and to select the counterparty to be used and the commission cost to be paid.

Renaissance exercises its investment authority on behalf of the trading entities within each Fund Family pursuant to provisions in each of the trading entities' limited partnership agreements, limited liability company operating agreements, or investment management agreements, as applicable. Renaissance exercises its investment authority on behalf of the Account pursuant to a written investment management agreement, which includes investment guidelines imposed by the Account's owner.

Limitations on Renaissance's authority are guided by its responsibility to act as a fiduciary when handling clients' accounts, the obligation to seek best execution of clients' trades, and the Funds' offering documents.

### **Item 17: Voting Client Securities**

The Firm has authority to vote proxies on behalf of the Funds.

The Firm has established a two-tiered policy for voting proxies. For the RIEF and RIDA Funds, which employ a long-term holding strategy, proxies will be voted, and the Firm will generally rely on the recommendations of its proxy adviser, Institutional Shareholder Services, Inc. ("ISS"). (If ISS does not have a recommendation, the Firm generally will abstain from voting.) The Firm believes that ISS makes proxy voting recommendations that are generally in the best interests of the RIEF and RIDA Funds in an impartial manner. For the Medallion Funds, which are traded pursuant to a high turnover strategy, the Firm will abstain from voting proxies, as it has concluded that under ordinary circumstances the voting of proxies for these Funds would not be in the best interests of its clients because (a) it would divert resources away from the implementation of its trading strategy and (b) given the Funds' high rate of turnover, it is unlikely that securities held on a particular record date would remain in the portfolio on the date of the vote.

Notwithstanding the above, in certain limited circumstances, the Firm may cast proxies for the Medallion, RIEF, or RIDA Funds without regard to the recommendations of ISS, if applicable. The Firm does not expect any conflicts in its proxy voting practices; however, the Chief Compliance Officer will seek to identify any potential conflict of interest inherent in the Firm's vote, determine whether any such conflict is "material" (as interpreted by the SEC), and address such conflict in the best interests of the Fund.

Information about a particular vote cast and copies of the Firm's proxy voting policy and procedures are available to clients upon request.

The Firm is not authorized to vote client securities held in the Account. The beneficial owner of the Account will receive proxy materials directly and not from the Firm.

**Item 18: Financial Information**

The Firm does not require prepayment of fees six months or more in advance. Accordingly, no balance sheet is attached.

The Firm is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to its clients.

The Firm has never been the subject of a bankruptcy petition.