

Part 2 of Form ADV Brochure Document

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This brochure provides information about the qualifications and business practices of Algebris Investments (US) Inc. (“Algebris US”). If you have any questions about the contents of this brochure, please contact us at: 617-648-4828. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Algebris US is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

This brochure contains important information about Algebris US. The following materials changes have been made:

- The brochure dated June 2017 was updated in February 2018 as a result of changes in the way research is paid for.
- Alex Lasagna has replaced Davide Serra as the Chief Compliance Officer with effect 1 February 2018.
- Update to ownership structure 09/2018
- Update to ownership structure 04/2019

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Item 4 - Advisory Business

Algebris US was incorporated in August 2009 under the laws of Delaware and is wholly owned by Algebris Investments (Luxembourg) SARL. Algebris Investments (Luxembourg) SARL is wholly owned by N1 S.a r.l., which is wholly owned by Davide Serra.

Algebris US is in common ownership with Algebris (UK) Limited (“Algebris UK”). Algebris US and Algebris UK are hereinafter collectively referred to as “Algebris” or the “Company”. Algebris UK is authorized and regulated by the UK’s Financial Conduct Authority and is also an SEC Exempt Reporting Adviser. Algebris UK’s office is located in London, it has no presence in the US. Algebris UK provides investment advisory services to various pooled investment vehicles. Algebris UK has sub-delegated certain investment advisory services to Algebris US.

Algebris UK provides investment advisory services to various pooled investment vehicles (the “Funds” or the “Clients”) on a discretionary basis with a focus on the global financial services sector. The Funds include UCITS funds, Private Funds, and private mandates. As of December 31, 2019, Algebris UK provided continuous and regular supervisory or management services to approximately \$8.5 billion of securities portfolios on a discretionary basis. As of December 31, 2019, Algebris US co-managed \$8.5 billion of this on a discretionary basis.

With respect to the Funds, Algebris manages assets in accordance with the investment objectives and restrictions set forth in the governing documents applicable to each Fund. The individual needs of the investors in the Funds are not the basis of investment decisions. Investment advice is provided directly to the Funds and not individually to the Funds’ investors.

Item 5 - Fees and Compensation

Algebris US is compensated by Algebris UK. All fees paid by Algebris UK to Algebris US are paid by Algebris UK directly and not by any Clients. Algebris UK maintains the relationship with all Clients, and fees are paid to Algebris UK.

The compensation Algebris UK receives from the Funds is comprised of a management fee based on a percentage of assets under management, as well as a performance-based fee (i.e., a fee based on a share of capital gains on or capital appreciation of the assets under management). Management fees range between 0% and 2% per annum, depending on the share class or series of the Fund and the amount invested, and are typically paid monthly in arrears. The performance fee varies across different Funds and share classes. It is defined in the relevant Fund documents and is between 0% and 20% of net profits considering high water marks where applicable and is typically paid quarterly, annually, or upon redemption. Algebris waives fees for Company employees, directors, and advisory affiliates. Additionally, certain initial, or “seed,” investors in a Fund may pay lower fee rates than those available to subsequent investors.

In addition to the management and performance fees discussed above, the Funds are responsible for the payment of administration, brokerage, and custodial fees, as well as their own operating costs. Such costs include those relating to, amongst other things: (1) the charges and expenses of legal advisers, auditors, and consultants; (2) borrowing and trading costs; (3) taxes and corporate fees

payable to governments or agencies; (4) directors' fees; (5) preparing, printing, and distributing financial and other reports; and (6) insurance. In addition, an anti-dilution levy is charged with respect to certain share classes in the UCITS Funds. A complete description of fees and expenses applicable to each Fund is available in Fund offering documents.

Item 6 - Performance-Based Fees and Side-by-Side Management

As described in Item 5 above, Algebris may receive performance-based compensation. Performance-based fees may create an incentive for Algebris to make investments that are riskier or more speculative than would be the case in the absence of a performance fee. Since the performance fees charged to each Fund are based on both realized and unrealized gains, the Company may receive a performance allocation reflecting unrealized gains at the end of a period that are not subsequently recognized by the Fund. In addition, Algebris may have an incentive to favor certain Clients from which the Company receives a higher performance fee. This risk is mitigated by the implementation of detailed allocation procedures and the ongoing review of Fund portfolios by investment and compliance personnel. Algebris recognizes that it is a fiduciary and as such must act in the best interests of the Advisory Clients.

Item 7 - Types of Clients

As previously described in Item 4, Algebris provides investment advisory services to various collective investment vehicles.

Subject to the discretion of Algebris to accept less, the minimum Fund investment ranges between EUR500 and EUR50 million, depending on the Fund and share class invested in. Although the Company has the authority to accept a lesser amount, the minimum investment for a separately managed account is generally US\$100 million.

Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis and Investment Strategies

Algebris seeks to take advantage of any mispricing opportunities of companies largely in the global financial services industry through a systematic fundamental analysis and assessment of a company's intrinsic value. The strategy also tries to exploit mispricing that arises as a result of operational or structural changes in a company or a change in the macroeconomic, capital markets, or industry sector environments within which a company operates. These changes can significantly affect the short, medium, and/or long-term growth prospects, economic return, and risk profile of a company and thereby substantially impact its intrinsic value. As such, Algebris will typically seek to take either long or short positions in equity and debt securities of companies exhibiting one or more of the following characteristics:

1. Change in revenue growth prospects;
2. Change in projected operating expenses;
3. Change in balance sheet quality;

4. Speculation regarding a possible sale, disposal, or acquisition;
5. Change in execution capability and/or strategic direction due to a change in management;
6. Change in capital discipline;
7. Change in regulation;
8. A change in overall risk appetite; or
9. A change in valuation methodology.

Algebris seeks to take long positions in securities when it believes that the market price of a security is below its estimated intrinsic value and take short positions in securities (typically through derivatives) when the market price of a security is above its estimated intrinsic value.

Algebris constructs broad-based portfolios, which are represented by companies in some or all of the following financial sub-sectors, but always dependent on any investment restrictions set out in the Funds offering documents or prospectus: banks, insurance companies, real estate investment trusts (“REITs”), asset managers, broker-dealers, diversified financial services providers, companies that derive a significant proportion of their total revenues as suppliers to financial services and real estate companies, and companies that depend on the provision of financial services for the sale of their core products. Algebris invests in a wide range of instruments, including, but not limited to: listed and unlisted equities, debt securities (both investment and non-investment grade), promissory notes, GDRs and ADRs, options (including uncovered options), warrants, equity swaps, contract for differences, futures, credit derivatives and other derivative instruments. Derivatives may be used for investment as well as hedging purposes. The Funds may engage in short sales of securities and may also retain amounts in cash or cash-equivalents, as considered appropriate.

Risk of Loss

Investing in securities involves the risk of loss that Clients and investors should be prepared to bear. An investment in a Fund should only be made after consultation with independent qualified sources of investment and tax advice. No guarantee or representation is made that a Fund’s investment program will be successful and performance could be negatively impacted by a number of risks, including, but not limited to:

1. **Liquidity** – Certain markets may have a relatively low volume of trading. Securities of companies in such markets may also be less liquid and more volatile than securities of comparable companies elsewhere.
2. **Legal and Political Risk** – Many of the laws that govern private and foreign investment, equity securities transactions, and other contractual relationships in certain countries, particularly in developing countries, are new and largely untested. As a result, a Client may be subject to a number of unusual risks, including inadequate investor protection, contradictory legislation, incomplete, unclear and changing laws, ignorance or breaches of regulations on the part of other market participants, lack of established or effective avenues for legal redress, lack of standard practices and confidentiality customs characteristic of developed markets, and lack of enforcement of existing regulations.

3. **Derivatives** – The Funds may make use of various derivative instruments, such as convertible securities, options, futures, forwards, and interest rate, credit default, total return, and equity swaps. The use of derivative instruments involves a variety of risks, including a high degree of leverage sometimes embedded in such instruments. The derivatives markets are frequently characterized by limited liquidity, which can make it difficult as well as costly to close out open positions in order either to realize gains or to limit losses.
4. **Counterparty (Credit) Risk** – The Funds may enter into transactions in OTC markets whereby the Funds will be exposed to the risk that the counterparty may default on its obligations to perform under the relevant contract. In the event of a bankruptcy or insolvency of a counterparty, a Fund could experience delays in liquidating the position and may incur significant losses.
5. **International Investing** – Investing outside the United States may involve greater risks than investing in the United States. These risks include: (i) less publicly-available information; (ii) varying levels of governmental regulation and supervision; and (iii) the difficulty of enforcing legal rights in a non-U.S. jurisdiction and uncertainties as to the status, interpretation, and application of laws.
6. **Emerging and Frontier Markets** – An investment in emerging and frontier market securities involves a greater degree of risk than an investment in securities of issuers based in developed countries. Among other things, emerging and frontier market securities investments may carry the risks of less publicly-available information, more volatile markets, less strict securities market regulation, less favorable tax provisions, and a greater likelihood of severe inflation, unstable currency, war, and expropriation of personal property than investments in securities of issuers based in developed countries.
7. **Short Sales** – Short selling involves selling securities which are not owned by the short seller and borrowing them for delivery to the purchaser, with an obligation to replace the borrowed securities at a later date. A short sale creates the risk of a theoretically unlimited loss, in that the price of the underlying security could theoretically increase without limit, thus increasing the cost to the Fund of buying those securities to cover the short position.
8. **CoCo Bonds** – Several Algebris Funds may invest in contingent convertible securities ('CoCos'). CoCos have unique risks, for example, due to equity conversion or principal write-down features which are tailored to the issuing entity and its regulatory requirements, which means the market value of CoCos may fluctuate.

Investors should refer to Fund offering documents or prospectus for a complete description of the risks involved in a Fund investment.

Item 9 - Disciplinary Information

Algebris and its management personnel have not been involved in any legal or disciplinary events that would be material to a Client or investor's evaluation of the Company or its management personnel.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Algebris nor its management persons are registered or have an application pending to register as a broker-dealer. Neither Algebris nor its management persons are registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Members of the US sales team who are employed by Algebris US are registered representatives of Foreside Financial Services, LLC (“Foreside”). Foreside is a limited liability company with its principal office and place of business at Three Canal Plaza, Suite 100, Portland ME 04101. Foreside is a registered broker-dealer (CRD#148477 / SEC# 8-68027).

Pooled Investment Vehicles

Certain of the Funds (or their sub-funds or feeders) are U.S. limited partnerships that are controlled by affiliated General Partner entities (the “GP Entities”). Algebris or the GP Entities will be responsible for decisions regarding such Funds and shall have full discretion over the management of such Funds’ investment activities. Any persons acting on behalf of the GP Entities are subject to the supervision and control of Algebris.

Other Investment Advisers

Algebris Investments (Asia) PTE Ltd (“Algebris Asia”) is under common ownership with Algebris US and Algebris UK. Algebris Asia is a Licensed Fund Management Company with the Monetary Authority of Singapore. It provides research and advisory services to Algebris UK pursuant to a written sub-advisory agreement. Algebris Asia does not provide services to anyone other than Algebris UK. All fees paid to Algebris Asia are paid by Algebris UK directly and not by any Clients.

Group Service Providers

Algebris UK has established a branch in Milan. Algebris (UK) Limited – Milan Branch is under common ownership with Algebris US and Algebris UK. It does not perform any investment management activities. It undertakes marketing activities in Italy and provides recommendations to Algebris UK. Algebris has an office in Luxembourg which provides additional back office services to Algebris UK.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading

Code of Ethics and Personal Securities Transactions

Algebris permits its employees to engage in personal securities transactions on a limited basis. To avoid any potential conflicts of interest involving personal trades, Algebris has adopted a Code of

Ethics. The Code of Ethics addresses, among other things, insider trading, information barriers, and personal securities transactions and requires employees to adhere to the following principles:

1. The interests of Clients must take precedence over those of employees;
2. All personal securities transactions must be conducted in a manner consistent with applicable laws and must avoid any actual or potential conflicts of interest or any abuse of a position of trust and responsibility;
3. Employees may not take inappropriate advantage of their position at Algebris; and
4. Information about Clients, portfolio holdings, and investment recommendations must be kept confidential.

In all cases, Clients' interests are paramount and take priority over employees' interests. Employees must not effect transactions that could give rise to an actual or perceived conflict between their own interests and that of a Client.

The Code of Ethics governs personal trading activities by employees and their immediate family members. Specifically, the Code of Ethics requires employees to pre-clear certain personal securities transactions, provide confirmation of all personal trades as soon as possible after execution and provide initial and annual security holdings reports.

The Compliance Department monitors employees' personal trading activity to ensure that transactions have been executed in accordance with the Code of Ethics and relevant rules and regulations. A copy of the Company's Code of Ethics is available to current and prospective Clients upon request.

Participation or Interest in Client Transactions

Algebris, its employees, and other related entities may have an ownership interest in certain Funds in which other Funds may invest (e.g., feeder funds will invest in a master fund for which an affiliate of Algebris serves as managing member). Algebris may engage in principal trades from time to time. The interests of Clients take precedence over those of Algebris.

The Company has adopted policies and procedures to ensure that neither Algebris nor its employees front run Clients or otherwise engage in activities that would or could be perceived as market abuse.

Different Parts of Capital Structure

Algebris, on behalf of its Advisory Clients, may make investments in different parts of the capital structure of the same company across different Funds. For example, a Client may invest in debt securities issued by a company in which another Client has an equity interest. In this and other cases, there may be an apparent or actual conflict between the interests of different Algebris Funds. Algebris has policies and procedures in place to mitigate this and other potential conflicts of interest (or the appearance thereof).

Item 12 - Brokerage Practices

Algebris considers the following factors in selecting broker-dealers for Fund transactions and determining the reasonableness of their compensation:

1. Knowledge of the security and/or market,
2. Ability to deal at the best price,
3. Execution efficiency,
4. Credit standing and reputation.

Although Algebris seeks competitive commission rates, it will not necessarily pay the lowest commission rate available. Transactions may involve specialized services on the part of a broker-dealer, which may justify higher commissions than would be the case for more routine services.

Algebris pays for all relevant third party research that it receives from sell side firms who Algebris has trading relationships with via direct payments from Algebris' own resources. Algebris does not accept any research from broker-dealers with whom it has a trading relationships which is not paid for by Algebris (with the exception of minor non-monetary benefits). Algebris does not have any active commission sharing arrangements ("CSAs") in place with broker-dealers. At all times, the broker-dealers are subject to the requirement to provide Algebris' clients with Best Execution.

Trade Aggregation

Orders for the same security entered on behalf of more than one Fund will usually be aggregated (i.e., blocked or bunched) as this is deemed to be in the best interests of all participating Funds. Subsequent orders for the same security entered during the same trading day may be aggregated with any previously unfilled orders. Subsequent orders for the same security for the same account(s) will not be aggregated with any previously filled orders. All Funds participating in an aggregated order shall receive the average price and pay a pro rata portion of transaction costs.

The firm has a fair allocation policy for allocating trades across the various funds. The firm's Order Management System ("OMS") has a pre-coded, third-party allocation algorithm that auto allocates executed trades to the relevant funds. The algorithm allocates trade fills continuously, as trades get executed, giving priority to the account that has received the least percentage of its target quantity. This way fills are distributed in proportion (pro rata) to the desired allocation at the time the order was generated. Note that, as the fills get allocated immediately, partially and fully filled trades get the same treatment. Fair allocation and best execution across funds are reviewed periodically as part of the compliance monitoring program.

Cross transactions

As a result of subscriptions or redemptions and the changes in the value of the assets of the various Funds or accounts managed by Algebris, the Company may adjust, to the extent practicable, the exposure levels in the respective Funds which may follow the same, or similar, investment strategies to instruments in their respective portfolio in order to maintain the exposures deemed most appropriate by Algebris.

Such adjustments may be effected by purchases and sales in the market or by a transfer from one or more Funds to other Funds (a "Cross-Transaction"). A Cross-Transaction may be effected if Algebris determines the transaction to be in the best interests (and consistent with the investment program, risk management and other relevant considerations) of the affected Funds. Generally, the relevant asset will be transferred at a price equal to its market price on the transfer date, as determined by either the market on the relevant day, or by the administrator to the Funds involved.

Item 13 - Review of Accounts

Generally, Client accounts are reviewed on a continuous basis by investment personnel. The Investment Committee, which is chaired by the Chief Investment Officer and involves all Portfolio Manager's globally meets twice a week. The Investment Risk Committee which is co-chaired by the Chief Risk Officer and Chief Investment Officer meets on a monthly basis. These reviews are designed to monitor and analyze Client transactions and positions and ensure compliance with investment objectives and restrictions. Particular attention is given to changes in company fundamentals, industry outlook, market outlook, and price levels.

Investors will receive a variety of reports on a regular basis, depending on the Fund in which they are invested. Such reports include monthly Factsheets and net asset value reports, quarterly account statements, and annual financial statements.

Item 14 - Client Referrals and Other Compensation

Algebris does not receive an economic benefit from anyone who is not a Client for providing investment advice or other advisory services to Clients.

Algebris does not compensate anyone who is not a supervised person, either directly or indirectly, for Client referrals.

Item 15 - Custody

All Client assets are held in custody by unaffiliated broker-dealers or banks. However, Algebris has access to the Funds' accounts since an affiliate serves as the managing member or general partner of the Funds. Investors do not receive statements directly from Fund custodians. Instead, the Funds are subject to an annual audit and audited financial statements are distributed to each investor. Audited financial statements are prepared in accordance with either GAAP or IFRS and distributed within 120 days of each Fund's fiscal year end. Fund investors should carefully review each statement.

Item 16 - Investment Discretion

Algebris manages the Funds on a discretionary and, in some instances, on a non-discretionary basis subject to the guidelines and restrictions set forth in Fund offering documents. For the discretionary managed Funds the Company typically has authority to determine the quantity and the individual

securities to be bought and sold without obtaining Fund or investor consent to specific transactions. In certain cases investments in addition to those stipulated in the relevant investment mandate may be permitted with prior consent from the relevant Client.

Item 17 - Voting Client Securities

Algebris has authority to vote proxies on behalf of the Funds. Algebris votes proxies so as to promote the long-term economic value of the underlying securities. Each proxy proposal will be considered on its own merits, and the Company will vote exclusively with the goal of best serving the financial interests of the Funds.

Algebris may have a conflict of interest in voting a particular proxy. A conflict of interest could arise, for example, as a result of a business relationship with a company, or a direct or indirect business interest in the matter being voted upon, or as a result of a personal relationship with corporate directors or candidates for directorships. If Algebris determines that it or one of its employees faces a material conflict of interest in voting a proxy, Algebris' procedures provide for the governing body of each Fund to determine the appropriate vote.

Item 18 - Financial Information

Algebris has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage Client accounts.