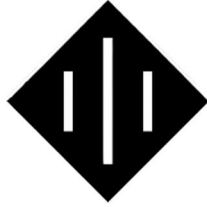


DEI POLICY



October 2025

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Board or Committee Approval Required ?	no

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1 REGULATORY REFERENCES

- Articles L1132-1 et seq. of the French Labour Code
- Law n° 2008-496 of May 27 2008
- Sapin II Law (n° 2016-1691)

2 PURPOSE

111 Capital (“the Company”) is committed to fostering a professional environment that values diversity, promotes equity, and encourages inclusion. 111 Capital believes that diverse perspectives contribute to better decision-making, innovation, and long-term success.

3 CURRENT APPROACH

As a small quantitative investment firm, the Company is yet at an early stage in developing formal DEI initiatives. The goal is to progressively build awareness and structure around diversity and inclusion while maintaining fairness and equal opportunity in all employment practices.

4 CORE COMMITMENTS

The Company commits to:

- Providing equal opportunity in recruitment, training, promotion, and compensation, without discrimination on any unlawful ground.
- Encouraging respectful and inclusive behavior in the workplace.
- Raising awareness among employees about unconscious bias and inclusive conduct.
- Reviewing HR processes to ensure fairness and accessibility.

5 GOVERNANCE

Responsibility for DEI lies with the CEO, who will report annually to 111 Capital management on progress, observations, and next steps.

6 REVIEW AND DISCLOSURE

This Policy will be reviewed annually and updated as DEI initiatives evolve. It is made available on the Company’s website under “Regulatory Information.”