

**Item 3. Disciplinary Information**

Not applicable.

**Item 4. Other Business Activities**

Alkeon is the sole Member of SilverBay Capital Management, LLC, a Delaware limited liability company ("SilverBay") that was formed in August 2009, which is also registered as an investment adviser with the SEC. Alkeon's personnel (through SilverBay) manage ACAP Strategic Fund and Bluepoint Investment Series Trust, both registered investment companies, and may manage other registered investment funds in the future.

Some of Alkeon's personnel also are registered representatives and employees of Breakwater Group, LLC ("Breakwater"), a broker-dealer that may be deemed to be affiliated with Alkeon. Currently, Breakwater assists in the distribution of the ACAP Strategic Fund and Bluepoint Investment Series Trust and does not have a trading function. Additional information about SilverBay is available on the SEC's Investment Adviser Public Disclosure website, and additional information about Breakwater is available on FINRA's website.

**Item 5. Additional Compensation**

Not Applicable.

**Item 6. Supervision**

Alkeon has implemented a Code of Ethics, which governs the supervised persons' activities, including the investment advice that each provides to clients. Greg Jakubowsky (Alkeon's Chief Compliance Officer) and Jennifer Shufro (Alkeon's Managing Director of Legal and Compliance) supervise Alkeon's supervised persons by monitoring their compliance with Alkeon's Code of Ethics. Their telephone numbers are [REDACTED] respectively.

**Item 7. Requirements for State-Registered Advisers**

Not Applicable.