

AMMEL Shareholders Rights Directive Disclosure

At Architas Multi-Manager Europe Limited (“AMMEL”) or (“Architas”) we are committed to acting as a responsible investor on your behalf. A summary of the AMMEL Voting Policy is available upon request. The Voting Policy has been produced on the basis of describing Architas’ approach to meeting best practice standards (such as factoring in the UK Financial Reporting Council's Stewardship Code) for the funds we manage directly and for the funds that we delegate to others to manage on our behalf.

Under S.I. No. 81 of 2020 the European Union (Shareholders’ Rights) Regulation which came into force on 30 March 2020, asset managers such as Architas are required either to publish an Engagement Policy and information concerning about how we comply with the regulations, or to explain why not.

The engagement policy must describe how the firm:

- (a) integrates shareholder engagement in its investment strategy,
- (b) monitors investee companies on relevant matters, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance,
- (c) conducts dialogues with investee companies,
- (d) exercises voting rights and other rights attached to shares,
- (e) cooperates with other shareholders,
- (f) communicates with relevant stakeholders of the investee companies, and
- (g) manages actual and potential conflicts of interest in relation to its engagement.

Architas Multi-Manager Europe has decided not to publish an Engagement Policy at this time.

As a ‘multi manager’ firm, apart from investment funds constituted as corporations, Architas does not invest directly in company shares. In the absence of clear regulatory guidance or clear market practise on how the engagement policy should apply to multi-managers, we have decided to continue to rely on our existing Voting Policy which works towards the same ends, but is based on guidance (such as individual guidance from the UK Financial Reporting Council) on how multi-managers should promote stewardship and engagement.

We will keep this decision under review and may publish an Engagement Policy at a later date if required by regulations or if such policy will add value to our clients.