

SHAREHOLDER RIGHTS DIRECTIVE II

AlbaCore Capital Limited

Article 3(g) of Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC (together with the relevant national implementing regulations, the “SRD”) requires asset managers to adopt on a “comply or explain” basis an engagement policy describing how an asset manager integrates its investment strategy relating to shareholder engagement in companies that have a registered office in the EU and are listed on EU regulated markets (“EU investee companies”).

AlbaCore Capital Limited is an asset manager for the purposes of the SRD. AlbaCore Capital Limited does not actively invest as part of its investment strategy in the shares of EU investee companies, but may on an infrequent basis invest in EU listed equities as an investment ancillary to, or as a result of a debt investment. AlbaCore Capital Limited has determined that due to the nature and size of such investments, it is not appropriate to adopt an engagement policy for the purposes of the SRD.

AlbaCore Capital LLP

Rule 2.2B.5R in the Conduct of Business Rules Sourcebook (“COBS”) of the UK Financial Conduct Authority, which implements Article 3(g) of Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC (together with the relevant national implementing regulations, the “SRD”) requires UK asset managers to adopt on a “comply or explain” basis an engagement policy describing how an asset manager integrates its investment strategy relating to shareholder engagement in companies whose shares are listed on EU regulated markets or comparable markets outside of the EU (“investee companies”).

AlbaCore Capital LLP is an asset manager for the purposes of COBS and the SRD. AlbaCore Capital LLP does not actively invest as part of its investment strategy in the shares of investee companies, but may on an infrequent basis invest in listed equities as an investment ancillary to, or as a result of a debt investment. AlbaCore Capital LLP has determined that due to the nature and size of such investments, it is not appropriate to adopt an engagement policy for the purposes of COBS or the SRD.

27 February 2020