

Shareholder Rights Directive Statement

Updated March 2023

The Shareholder Rights Directive II (SRD II) is a European Union (EU) directive, which aims to promote common effective stewardship objectives and long-term investment decision making across institutional investors and asset managers to strengthen the position of shareholders and to ensure that decisions are made for the long-term stability of companies.

SRD II amends the original SRD, which came into effect in 2007, with the objective of improving corporate governance in companies which have their registered office in an EU Member State and whose securities are traded on the EU's regulated markets.

Fideuram Asset Management UK Limited (the "Company") is an investment management company providing investment and advisory services to institutional clients and the Company's regulator, the Financial Conduct Authority requires the Company to make the following disclosures about its Engagement Policy (the "Policy") and investment strategies:

- To publish the Company's Policy;
- Comment annually thereafter on the implementation of the Policy;
- If no Policy was in place by June 2019, the Company must publicly explain why this was the case and what action it is taking to remedy this; and
- To provide information to asset owners, including on how their investment strategies contribute to the medium-to-long term performance of the assets.

Further to the above, the Company took the decision not to integrate shareholder engagement into its investment strategy under the requirements of SRD II by implementing a Policy. This decision was based on the inability of the fact that the Company manages a portfolio of intra-group investment funds and unit-linked portfolios where the voting power remains with the delegating entity.

The decision not to implement a Policy will be annually reviewed by the Company.

Contact Details for Enquiries:

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