

1. UK Stewardship Code Disclosure

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Gramercy Ltd (the "Firm") is required to include on this website a disclosure about the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or, where it does not commit to the Code, its alternative investment strategy. The Code sets out a number of principles relating to engagement by investors with UK equity issuers, as follows:

The Code has the following six principles for asset managers: (i) signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries; (ii) signatories identify and respond to market-wide and systemic risks to promote well-functioning financial markets; (iii) signatories engage to maintain or enhance the value of assets; (iv) signatories actively exercise their rights and responsibilities; (v) signatories integrate stewardship considerations into their selection and oversight of external managers; and (vi) signatories monitor and hold to account stewardship service providers.

The Firm's approach to engagement with issuers is determined on a case-by-case basis to promote the best interests of the portfolios it manages. Consequently, while the Firm supports the general objectives that underlie the Code, the Firm does not consider it appropriate to commit to a particular voluntary code of practice and has chosen not to commit to the Code.

2. Shareholder Rights Directive (SRD II)

SRD II aims to promote effective stewardship and long-term investment decision making, in respect of shares traded on UK regulated markets and comparable regulated markets outside the UK. It came into effect in the UK on 10 June 2019.

The rules require asset managers, who invest in shares traded on a regulated market detailed above, to:

- Publish their shareholder engagement policy (or explain why they do not have one) – COBS 2.2B.5R.
- Make annual public disclosures relating to the implementation of their shareholder engagement policy, from 10 June 2020 – COBS 2.2B.5R.
- Make disclosures to asset owners, including how their investment strategies contribute to the medium to long term performance of their assets – COBS 2.2B.9R.

Gramercy Ltd does not manage investments in shares which are traded on a UK regulated market, or on a comparable regulated market outside the UK, and so the SRD II rules do not apply to it. Therefore, we have not developed a shareholder engagement policy and nor are we required to make the disclosures outlined above.

If the Firm's investment strategy changes in such a manner that the provisions of the Code or SRD II become relevant, the Firm may amend this disclosure accordingly.