QUAEROCAPITAL

Engagement Policy - Shareholder Rights Directive II ("SRD II")

The Shareholder Rights Directive ("SRD II") came into force on 10th June 2019 and was implemented

by the FCA in COBS 2.2B of the FCA Handbook. SRD II aims to promote effective stewardship and long-

term investment decision-making by enhancing transparency of engagement policies and investment

strategies across the institutional investment community.

Quaero Capital LLP is working closely with our ESG Team to consider the requirements under COBS

2.2B and SRD II to develop and publish an Engagement Policy. Further updates will be published under

the "Regulatory Disclosures" section in due course: https://quaerocapital.com/en/about-

us/affiliates/quaero-capital-llp/.

The Quaero Capital Group's existing Responsible Investment policies, including the Group's current

Dialogue & Engagement Policy, can be found here: https://quaerocapital.com/en/sustainability/.

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