

## Shareholder Rights Directive Annual Disclosure 2021

Bellevue Asset Management (UK) Ltd (“BAM UK”) makes the below annual disclosure under obligations arising from Article 3g(1)(b) of the revised Shareholder Rights Directive (EU 2017/828) (“SRD”) for the 12 month period up to 30 June 2021.

<p><b>How has BAM UK’s engagement policy been implemented in a way that meets the requirements set out below.</b></p> <p><b>COBS 2.2B.5R (1) (b)</b></p>	<p>The Firm has acted in accordance with its engagement policy at all times during the period under review.</p>
<p><b>General description of voting behaviour.</b></p> <p><b>COBS 2.2B.7R (1)</b></p>	<p>The Firm has voted in ways which it believes have been in the best interests of the Fund it manages.</p>
<p><b>How has BAM UK cast votes in the general meetings of companies in which it holds shares.</b></p> <p><b>COBS 2.2B.7R (2)</b></p>	<p>The Firm has generally voted with management. Where the Firm disagrees with material issues then it has tended to dispose of the position as the size of the holding is not usually of such significance as to be able to influence the outcome.</p> <p>The Firm has not voted on any significant votes as defined in SRD.</p>
<p><b>An explanation of BAM UK’s most significant votes.</b></p> <p><b>COBS 2.2B.7R (1)</b></p>	<p>All votes cast during the period have not related to significant votes as defined in SRD.</p>
<p><b>BAM UK’s use of the services of proxy advisors.</b></p> <p><b>COBS 2.2B.7R (1)</b></p>	<p>The Firm does not use proxy advisors.</p>