

ALVARIUM

Alvarium Disclosure Statement

Directive (EU) 2017/828 (the “Shareholders’ Rights Directive II”)

Alvarium RE Limited and Alvarium Investment Managers (UK) LLP (each individually, and together collectively, referred to as “**Alvarium**”) provide discretionary management services to clients. In accordance with article 3g of the Shareholders’ Rights Directive II and SYSC 3.4.4R, this disclosure statement is intended to confirm that Alvarium will not be developing and publicly disclosing an engagement policy, and to explain the basis of Alvarium’s approach.

The discretionary management services provided by Alvarium to clients focuses on investing in collective investments. Alvarium The FCA Policy Station 19/13 clarifies that the scope of the rules contained in the Shareholders’ Rights Directive only to investing in shares traded on a regulated market. Alvarium does on occasion invest in shares which are traded on a regulated market. However, these types of investment form a minority of the investments made by Alvarium on behalf of its clients in its capacity as a discretionary manager. Where Alvarium does invest in the shares of an entity which are traded on a regulated market, Alvarium will typically hold a very small proportion of the shares issued in that entity.

As such, Alvarium has taken the view that the creation of an engagement policy would not be a proportionate measure to address the underlying objective in the Shareholders’ Rights Directive II of promoting shareholder engagement. Alvarium will continue to review appropriate market practice information and relevant developments to assess whether it would be

If you have any questions or would like any more information about Alvarium’s approach to the Shareholders’ Rights Directive II, please contact ComplianceTeamUK@alvariuminvestments.com