

Shareholder Rights Directive II ("SRD II")

SRD II aims to improve stewardship and corporate governance by firms, including full scope Alternative Investment Fund Managers that invest in shares traded on a regulated market in the EEA, as well as 'comparable' markets situated outside of the EEA. Under FCA [COBS 2.2.B.5R](#), Alfreton Capital LLP (the "Firm") is required to:

- a) develop and publicly disclose an engagement policy that meets the requirements of COBS 2.2B.6R; and
- b) publicly disclose on an annual basis how our engagement policy has been implemented in a way that meets the requirements of COBS 2.2B.7R; or
- c) publicly disclose why we have chosen not to comply.

The engagement policy must describe how we:

- 1) integrate shareholder engagement in our investment strategy;
- 2) monitor investee companies on relevant matters, including:
 - a) strategy;
 - b) financial and non-financial performance and risk;
 - c) capital structure; and
 - d) social and environmental impact and corporate governance;
- 3) conduct dialogues with investee companies;
- 4) exercise voting rights and other rights attached to shares;
- 5) cooperate with other shareholders;
- 6) communicate with relevant stakeholders of the investee companies; and
- 7) manage actual and potential conflicts of interests in relation to our engagement.

On an annual basis, the Firm must disclose a general description of voting behaviour, an explanation of the most significant votes and reporting on the use of the services of proxy advisors. The disclosure must include details of how votes have been cast, unless they are insignificant due to the subject matter of the vote or to the size of the holding in the company.

The Firm supports the aims SRD II, takes a long-term approach to equity ownership and exercises its voting rights accordingly. However, the Firm has decided that it will not comply with the Directive at this time because the Firm's investment strategy is highly concentrated and public disclosure of its approach and the businesses it holds an equity interest in would be detrimental to the Firm's clients. The approach of the Firm in relation to engagement with issuers and their management is determined globally. The Firm takes a consistent approach to engagement with issuers and their management in all the jurisdictions in which it invests.

For further information on the Firm's approach, please contact the Firm's Compliance Department via email: am@alfretoncapital.com.