

COMMITMENT TO THE UK STEWARDSHIP CODE

Under Rule 2.2.3R of the Financial Conduct Authority's ("FCA") Conduct of Business Sourcebook, Principa Capital LLP ("Principa" or the "Firm"), to the extent it is managing investments for a professional client (as defined by the FCA), is required to include 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, explain its considered choice based on the Firm's investment approach.

The Code is a voluntary code aimed at enhancing the quality of engagement by asset managers and owners with corporate issuers and sets out 12 principles relating to how investment and stewardship is integrated, including environmental, social and governance issues.

Principa seeks investment opportunities in all global markets, although a particular focus of Principa's funds includes issuers operating in, or substantially exposed to, emerging markets in Asia, Latin America, Eastern Europe, the Middle East and Africa. Exposure to UK listed companies is achieved through investment in (non-voting) derivatives positions. Although the Code is therefore applicable to some aspects of Principa's strategy, this generally represents a small proportion of the invested asset base which is typically across a variety of jurisdictions globally. Furthermore, whilst the Firm is supportive of the Code's objectives and principles, the specific provisions of the Code are not aligned with the type of trading currently undertaken by the Firm.

The Firm has therefore chosen not to commit to the Code at this time. If the Firm's investment strategy changes, in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.

The Firm further provides regular and routine reporting to its clients, such that they remain apprised of the stewardship of their investments.