



Shareholder Rights Directive (“SRD”) II

SRD II amended the original Shareholder Rights Directive aiming to strengthen and promote long-term shareholder engagement, improve active ownership practices across the European Union (EU), and increase transparency for asset managers and owners. The updated Directive was implemented into domestic law in the United Kingdom and became effective as of 10 June 2019.

In the UK, COBS 2.2B details the FCA requirements on SRD II.

Pursuant to the relevant national implementation of Article 3g of SRD II, regulated firms are required to:

- Develop and publicly disclose a shareholder engagement policy meeting the requirements of Article 3g; and
- Publicly disclose on an annual basis how the implementation of such engagement policy meets the requirements of Article 3g; or
- **Publicly disclose why the firm has chosen not to comply.**

While in full support of the objectives and the spirit behind SRD II, Hansa Capital Partners LLP (“HCP” or the “Firm”) does not comply with the requirements of the SRD II, for the following reasons. The Firm pursues a global macro investment strategy, with a significant proportion of those assets being invested in third-party open-ended funds. HCP’s investment strategy does incorporate some investment within global listed equities; however, this only accounts for a small minority portion of the assets under management. Beyond this, the global equity positions that are held are generally small in size, in comparison to the equity’s market capitalisation. This limits the level of influence and responsive engagement that can be achieved from the investment. Accordingly, while the Firm ordinarily exercise the voting rights associated with these positions, due to the amount invested, the size of the position is often considered too small for any further constructive to take place.

As such, HCP does not currently consider it appropriate to develop, publish or annually disclose its position on a shareholder engagement policy. Should there be any changes to the Firm’s investment strategy, which involves a change in our approach to listed equity investments, this will be communicated appropriately to our clients and this disclosure will be reviewed and updated accordingly.

For further details on any of the above information, please contact Stephen Thomas, Compliance Officer, Hansa Capital Partners LLP.

Firm Name: Hansa Capital Partners LLP

Date: August 2023