UK STEWARDSHIP CODE DISCLOSURE STATEMENT

Under COBS 2.2.3 of the FCA Handbook, Hansa Capital Partners LLP (the "Firm") is required to make a public disclosure in relation to the nature of its commitment to the UK Stewardship Code. Effective from 1 January 2020, the Financial Reporting Council's ("FRC") UK Stewardship Code (the "Code") was substantially updated to be applicable to a broader range of investment strategies, other than purely listed equity, such as fixed income bonds, real estate and infrastructure. It also reflects the growth of environmental factors, particularly climate change, as well as social and governance factors (together, "ESG") as material issues for asset managers to consider when making investment decisions and undertaking stewardship.

The Code aims to enhance the quality of engagement between asset managers and companies to help improve long-term risk-adjusted returns to shareholders and promote the efficient exercise of governance responsibilities. It also describes steps asset owners can take to protect and enhance the value that accrues to the ultimate beneficiary and sets out a number of areas of good practice on engagement with investee companies to which the FRC believes institutional investors should aspire.

The Code defines stewardship as "the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society".

The Code is directed in the first instance to institutional investors, by which is meant asset owners and asset managers with equity holdings in UK listed companies.

The Principles of the Code

There are twelve Principles of the Code that apply to asset owners and asset managers. These are grouped under four headings:

Purpose and governance

1. Purpose, strategy and culture
2. Governance, resources and incentives
3. Conflicts of interest
4. Promoting well-functioning markets
5. Review and assurance

Investment approach

6. Client and beneficiary needs
7. Stewardship, investment and ESG integration
8. Monitoring managers and service providers

Engagement

9. Engagement
10. Collaboration
11. Escalation

Exercising rights and responsibilities

12. Exercising rights and responsibilities

The FRC encourages signatories to the Code to review their policy statements annually and update them as necessary to reflect changes in actual practice.

FCA Regulatory Disclosure on the Stewardship Code

While adherence to the Code is voluntary, under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook ("COBS"), the Firm is required to include on this website a disclosure about the nature of its commitment to the UK Financial Reporting Council's Stewardship Code or, where it does not commit to the Code, its alternative investment strategy.

The Firm pursues a global macro investment strategy with a significant proportion of those assets being invested in third-party open ended funds, and only a minority proportion of assets under management invested in global equities. It is also noted that the few investments which are made in global listed equities are small in size, compared to its markept cap, which limits the level of influence that can be achieved through such stewardship activities. This investment strategy is pursued while providing portfolio management services to Hansa Investment Company Limited ("HICL") on a delegated basis from Hanseatic Asset Management LBG ("HAML"). Apart from this, the Firm also provides investment advisory services to HAML relating to a number of its underlying clients. However, as this is an advisory service, the Firm does not have direct responsibility for HAML's investment process or the investments ultimately executed on behalf of these HAML clients.

As a result, whilst the Firm generally supports the objectives that underlie the Code, the provisions of the Code are not considered to be directly relevant to the type of investment activities currently undertaken by the Firm. If the Firm's investment strategy or activities change in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure 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: *September 2025*