

# UK Stewardship Code Statement

Under Rule 2.23R of the FCA's Conduct of Business Sourcebook, Halo Global Asset Management (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 (the "Code") or where it does not commit to the Code, its alternative investment strategy. The Code is a voluntary code and sets out a number of principles relating to engagement by investors with UK equity issuers. Investors that commit to the Code can either comply with it in full or choose not to comply with certain aspects of the Code, in which case they are required to explain their noncompliance and state in general terms its alternative investment strategy.

The Seven Principles of the Code are that institutional investors should:

- Publically disclose their policy on how they will discharge their stewardship responsibilities
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship
- Monitor their investee companies
- Establish clear guidelines on when and how they will escalate their activities
- Be Willing to act collectively with other investors where appropriate
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities

The Firm pursues a strategy that invests in companies globally which are exposed to the growth of the Asian middle class and the corresponding rise in their consumption in various jurisdictions including the UK. Whilst the Firm generally supports the objectives that underlie the Code, the Firm at this time has chosen not to commit to the Code as the Firm does not take materially sized positions in listed equity securities. This policy will be kept under review.

We determine our approach to stewardship on a case by case basis, taking into account our duties to the Fund that we manage and the actions that will lead to the most favourable outcome for the value of our investments.

Furthermore the Firm takes a consistent approach to engagement with issuers and their management in all of the jurisdictions in which it invests and consequently does not consider it appropriate at this time to commit to any particular Code relating to any individual jurisdiction.

Further information on the Firm's approach to the Code contact: Rupert Perry - Compliance Officer at The Firm

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