

Conduct of Business Sourcebook rule 2.2.3R, requires Seven Pillars Capital Management LLP (“the Firm”) to include a disclosure on its website stating the nature of its commitment to the UK Stewardship Code (“the Code”) issued by the Financial Reporting Council. If the firm does not commit to the Code, it must state in general terms its alternative investment strategy. The Code is a voluntary code and sets out various principles relating to the level of engagement by investors with UK equity investors. Investors may either comply with the Code in full or choose not to comply with certain aspects of the Code, in which case an explanation of non compliance is required.

The Firm manages two Funds. One of these Funds pursues a multi-asset strategy. It invests in a broad range of asset classes on a global basis, namely fixed income, developed and emerging market equities, commodities, real estate, absolute return and private equity. The second Fund is a UCITS vehicle which invests in a global portfolio of equities and fixed income securities. These two strategies include investing in some UK listed equities and therefore the Code is applicable to a limited aspect of the Firm’s trading. However the Firm monitors its level of ownership in listed entities and is of the view that in all cases its voting rights are insignificant in terms of total shares in issue for such entities.

Whilst the Firm supports the Code’s objectives, it has decided not to commit to the principles of the Code. As part of its strategy the Firm does not anticipate actively engaging on a regular basis with management of investee companies and where there are concerns over governance which might threaten the value of such investments the Firm would consider exercising its voting power to oppose the board and/or disposing of its investment.