



## Intertrust Alternative Investment Fund Management (Ireland) Limited (the "AIFM")

Statement in Relation to Engagement Policy under the Shareholder Rights Directive

Pursuant to Article 3g of the Shareholders' Rights Directive II ("**SRD II**") and Section 1110G of the European Union (Shareholders' Rights) Regulations 2020 (the "**SRD II Regulations**"), the AIFM is required to (or to publicly disclose on its website or by way of other means accessible online, a clear and reasoned explanation why it has failed to) develop an engagement policy describing how it incorporates engagement with investee companies (being EU companies listed on a regulated market, as defined in SRD II), into its investment strategies.

The AIFM has chosen not to develop an engagement policy and publicly disclose such a policy on its website for the reasons set out below:

1. The AIFM does not itself invest in companies which have their registered office in a European Union member state (a "Member State") and the shares of which are admitted to trading on a regulated market situated or operating in a Member State.
2. The AIFM has not entered into an arrangement with an Institutional Investor<sup>1</sup> to invest the assets of the Institutional Investor or the assets of a fund managed by the Institutional Investor.
3. Only one AIF managed by the AIFM invests in companies which have their registered office in a Member State and the shares of which are admitted to trading on a regulated market situated or operating in a Member State. The investment manager of that AIF has itself chosen not to develop an engagement policy under SRD II because of the passive and engineered nature of the investment strategies pursued by the AIF.

---

<sup>1</sup> "Institutional Investor" means any life assurance company or occupational pension scheme that invests in shares traded on an EU regulated market.