

AManco S.A.

Voting Rights Policy

History

Version	Effective Date	Description	Initiated/ Amended by	Approved by the Management Committee	Approved by the Board on
V1	08/12/2021	Initial Procedure	ARC	24/11/2021	08/12/2021

Table of Contents

1. Glossary.....	3
2. Applicable regulations	3
3. Purpose of the Procedure.....	3
4. Organisation of voting rights exercise.....	3
5. Voting strategy	4
a. Long-term maximisation of AIFs value	4
b. Annual financial statements	4
c. Governing body	4
d. Disclosure.....	4
6. Review of the Procedure	4

1. Glossary

Term	Description
AManco / the Company	AManco S.A.
Board	Board of directors of the Company
CSSF	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg supervisory authority
Funds	Funds for which the Company acts as AIFM
Management Committee	Committee at the level of the Company composed of the Senior Management and the heads of department as permanent guests
Policy	The present voting rights policy
Senior Management	The persons responsible for the management of the Company, authorised by the CSSF, also known as “authorised management” or “conducting officers”

2. Applicable regulations

Term	Description
AIFM Law	Law of 12 July 2013 on alternative investment fund managers
AIFM Regulation	Commission Delegated Regulation (EU) no 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision
Circular	CSSF Circular 18/698 regarding the authorisation and organisation of investment fund managers governed by Luxembourg law

3. Purpose of the Policy

The Company shall uphold the interest of the Funds and its investors via the exercise of voting rights attached to the instruments held in the Funds’ portfolio.

The Company has there developed adequate and effective strategies for

- Monitoring relevant corporate actions;
- Ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the relevant Fund;
- Preventing or managing any conflicts of interest arising from the exercise of voting rights.

4. Organisation of voting rights exercise

The Company is responsible to exercise the voting attached to the instruments held in its portfolio. In principle, the conducting officer responsible for portfolio management is in charge of this exercise. The conducting officer responsible for portfolio management may be represented by (i) a member of the Company by virtue of a proxy or (ii) any person to whom a

power of attorney will be given by the AIFM with a view to executing the transaction approved by the Investment Committee.

5. Voting strategy

The conducting officer responsible for portfolio management monitors all relevant corporate actions in relation to the Funds' voting rights and ensures that the exercise of such rights is beneficial to the Funds and their investors. To this end, the conducting officer responsible for portfolio management shall participate in, or be represented at any relevant annual general meeting. In the event of a lack of information, the conducting officer responsible for portfolio management will abstain from a vote.

5.1. Long-term maximisation of the funds' value

The conducting officer responsible for portfolio management will exercise the right to vote upon taking into account all available information and only to the long-term benefit of the Funds and their shareholders.

5.2. Annual financial statements

Only where the annual financial statements are not compliant with standard accounting rules or where there is doubt that they may not be in compliance with standard accounting rules, the conducting officer responsible for portfolio management will vote against the acceptance of such annual financial statements. It includes situations where the conducting officer responsible for portfolio management estimates that the annual financial statements do not reflect the fair view of the company.

5.3. Governing body

A change of the governing body will only be voted for in case of:

- A considerable decline of performance;
- Significant doubts about the competences of the governing bodies;
- Severe misconduct of one or more members of the governing body;
- Loss of confidence in the governing body members.

5.4. Disclosure

A summary description of the strategies for the exercise of voting rights shall be made available to investors free of charge, in particular by way of a website.

6. Review of the Policy

The Policy will be reviewed at least once a year in order to assess if it:

- is operating as intended; and,
- is compliant with regulations and standards applicable to the Company.

Where no update is required, the Policy will be applied consistently over time. Where an update is required, the formal approval by the Board and Senior Management, will be asked, and all Staff will be informed.