

## Altum Management Company (Luxembourg) S.A.

### Shareholders and Voting Rights Procedure – Executive Summary

#### 1. Shareholders Rights

In accordance with Regulation (EU) 2019/1156 of the European Parliament and Council on facilitating cross-border distribution of collective investment undertakings. (The "Cross Border Fund Distribution" Regulation), investors and potential investors in a UCI (hereafter "the Shareholders") are hereby provided with a summary of investor rights. Such rights include:

##### a) Entitlement to subscribe and redeem interest in the UCI

Shareholders in the UCI are entitled to purchase and redeem a shareholding within the timeframe and subject to such conditions as detailed in the prospectus of the UCI.

##### b) Entitlement to receive certain information relating to investment in the UCI

As a Shareholder in the UCI, a copy of the latest annual and, where applicable, semi-annual financial statements of the UCI will be available to the shareholders as detailed in the UCI's prospectus. The latest Net Asset Value per Share is also available as detailed in the prospectus.

Should a Shareholder require any for which further information relating to the terms of their investment, they should refer to the prospectus, the Memorandum and Articles of Association of the UCI and share application form relating to their investment in the UCI.

Copies of the prospectus, the latest annual reports and any subsequent half-yearly reports and the supplement for the UCI may be obtained free of charge from the Central Administrator of the UCI (as detailed in the UCI prospectus).

##### c) Entitlement to make a complaint

Shareholders of a UCI are entitled to make a complaint free of charge. Any such complaint will be handled by the appointed management company, Altum Management Company (Luxembourg) S.A. ("Altum"), promptly and effectively. An executive summary of Altum Complaint Handling Policy is available on:

<https://ww2.linkgroup.eu/Altum/policies/>

Complaints may be submitted either by letter, by telephone or e-mail to the attention of the Complaints Handling Officer using the following contact details:

Altum Management Company (Luxembourg) S.A.

To the attention of the Complaints Handling Officer

Email: [complaints@linkfundsolutions.lu](mailto:complaints@linkfundsolutions.lu)

19-21 route d'Arlon, L-8009 Strassen, Grand Duchy of Luxembourg

##### d) Investor rights against the UCI and service providers of the UCI

Shareholders in a UCI have a right of action against the UCI for any breach of contract. Shareholders in a UCI do not have any direct contractual rights against any service provider appointed in respect of the UCI because of the absence of a direct contractual relationship between the Shareholder and the relevant service provider. Instead, the proper plaintiff in an action in respect of which a wrongdoing is alleged to have been committed against the UCI or its management company by the relevant service provider is typically the UCI or its management company as applicable.

Notwithstanding the foregoing, a Shareholder has a regulatory right of action to pursue the Depositary appointed by the UCI in respect (i) any loss of an asset held in the custody of the Depositary or any delegate of the Depositary or (ii) of any other losses caused by the Depositary's negligent or intentional failure to properly fulfil its obligations under applicable regulations provided that this does not lead to a duplication of redress or to unequal treatment of Shareholders in the UCI.



### e) Representative actions

A collective redress mechanism, as required under Directive (EU) 2020/1828, will be transposed into Luxembourg Laws by 25 December 2022 and enforced by 25 June 2023. When transposed, related shareholders' rights will be made available to the shareholders on

<https://ww2.linkgroup.eu/Altum/policies/>.

## 2. Voting Rights

Altum shall uphold the interest of the AIFs and/or UCITS under its governance and of its investors via the exercise of voting rights attached to the instruments held in its portfolios. Altum 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 each AIF and/or UCITS under Altum governance;
- Integrating shareholder engagement in its investment strategy;
- Preventing or managing any conflicts of interest arising from the exercise of voting rights.

Altum is responsible for exercising the votes attached to the instruments held in its portfolio. Altum does not exercise any voting rights attached to assets of any of the UCITS/AIFs under its governance where it has been appointed as Management Company / AIFM. The exercise of voting rights has been delegated to the Portfolio Manager who will exercise all such voting rights for the exclusive benefit of the UCITS/AIF.

Altum acknowledges that, in delegating the investment management activity, it retains an obligation to oversee its delegates. One of the responsibilities of the Portfolio Manager is to have an appropriate policy in place for voting rights procedures. Altum ensures, by carrying out due diligence, that each Portfolio Manager appointed by it has developed adequate and effective strategies for determining when and how voting rights attached to instruments held in the portfolio are to be exercised, to the exclusive benefit of the UCITS/AIF concerned.

A summary description of the strategies and policies referred to above shall be made available to investors if required. Details of the actions taken on the basis of those strategies shall be made available to the investors free of charge and on their request.

The proxy voting policy of the Portfolio Manager is designed to provide reasonable assurance that proxies are voted in the best interest of the shareholders of the funds governed by Altum. Where a Portfolio Manager has engaged a third party for proxy voting, Altum will request how this service operates and what are the guidelines used for proxy voting in order to serve the best interests of shareholders.

This should also apply when the Portfolio Manager decides to override the third-party proxy service vote recommendation for the shareholder based on its own determination that the shareholder would best be served with a vote contrary to the third-party recommendation. Such decisions will be documented by the Portfolio Manager.

Investors may request free of charge from Altum additional information by writing to:

Altum Management Company (Luxembourg) S.A.

Head of Compliance

19-21 route d'Arlon

L-8009 Strassen

Grand Duchy of Luxembourg

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