



2025 / Nevastar Finance Ltd.

SRD II NOTICE

SHAREHOLDER RIGHTS DIRECTIVE (SRD II) NOTICE

SRD II aims to promote effective stewardship and long-term investment decision making, in respect of shares traded on a regulated market. For these purposes a regulated market is a UK RIE (or a market outside the United Kingdom which meets comparable requirements and where the financial instruments dealt in are of a quality comparable to those in a regulated market in the United Kingdom). It came into effect on 10 June 2019.

The rules require asset managers, who invest in shares traded on a regulated market detailed above, to:

- publish their shareholder engagement policy (or explain why they don't have one) – [COBS 2.2B.5R](#).
- make annual public disclosures relating to the implementation of their shareholder engagement policy – [COBS 2.2B.5R](#).
- Make disclosures to asset owners, including how their investment strategies contribute to the medium to long term performance of their assets – [COBS 2.2B.9R](#).

NEVASTAR FINANCE'S POSITION

The Firm believes in the importance of effective stewardship and long-term decision making, involving transparency of engagement policies between institutional investors and the investee companies. However, the Firm does not predominantly hold large positions in equity securities/take material positions in equity securities of listed issuers.

In recognition of our limited ability to exercise significant influence on investee companies in circumstances where our shareholdings are not material, it is our policy of not to integrate shareholder engagement in investment strategies if the aggregate shareholding into investee companies amounts to less than 5% of the latter's outstanding shares -as calculated on the basis of the full market capitalisation methodology, as opposed to the free-float methodology.

As such, the Firm does not currently maintain and will not publish an engagement policy as specified by SRD II. The Firm will periodically review its investment strategies to determine whether its investment activities have changed to the extent that the Firm should adopt an engagement policy under SRD II.

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