



# Lombard Odier Asset Management (Europe) Limited

## Statement on Compliance with the EU Shareholder Rights Directive II (SRD II)

### Introduction

Lombard Odier Asset Management (Europe) Limited (“LOAME”) is the UK asset management arm of the Lombard Odier Investment Managers group (“LOIM”) which in turn is the asset management division of the wider Lombard Odier group (“LO Group”), a global private banking, asset management and banking technology infrastructure group headquartered in Geneva, Switzerland.

### Who we are

LOAME is a UK asset management firm regulated by the UK Financial Conduct Authority (FCA). The principal business activities of LOAME are the management of collective investment funds and discretionary investment mandates for institutional clients.

Under FCA COBS 2.2.3, the FCA requires any firm authorised to manage funds, which is not a venture capital firm and which manages investments for professional clients that are not natural persons, to disclose clearly on its website the nature of its commitment to the Stewardship Code or, where it does not commit, its alternative investment strategy. LOAME has published its Stewardship Code on its website at [www.loim.com](http://www.loim.com)

### Compliance with the EU Shareholder Rights Directive II

Directive 2017/828 of the European Parliament and of the Council of 17 May 2017, amending Directive 2007/36/EC. Laws, regulations and administrative provisions to implement the EU Shareholder Rights Directive II (SRD II) must be put in place by member states by 10 June 2019. Under this Directive, LOAME is required to develop and publicly disclose an engagement policy that describes how the Firm integrates shareholder engagement in our investment strategy. LOAME is also required on an annual basis, to publicly disclose how the Firm’s engagement policy has been implemented, including a general description of voting behaviour, an explanation of the most significant votes and the use of the services of proxy advisors. LOAME will also be required to publicly disclose how the Firm has cast votes in the general meetings of companies in which our funds hold shares.

LOAME is currently considering its engagement policy and compliance with its obligations under the EU Shareholder Rights Directive II and shall publish its updated engagement policy on its website at [www.loim.com](http://www.loim.com) in due course.