



Prusik Investment Management LLP

Commitment to the UK Stewardship Code

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Prusik Investment Management LLP (the "Firm") is required to include on its website a disclosure about the nature of its commitment to the Financial Reporting Council's UK Stewardship Code (the "Code") or, where it does not commit to the Code, its alternative investment strategy. The Code is a voluntary code and sets out a number of principles relating to engagement by investors with UK equity issuers. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non-compliance.

The Code consists of twelve principles. It requires, under four headings that signatories':

Purpose and Governance

1. Purpose, investment beliefs, strategy, and culture enable stewardship that creates long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society
2. Governance, resources, and incentives support stewardship
3. Manage conflicts of interest to put the best interests of clients and beneficiaries first.
4. Identify and respond to market-wide and systemic risks to promote a well-functioning financial system
5. Review their policies, assure their processes, and assess the effectiveness of their activities

Investment Approach

6. Take account of client and beneficiary needs and communicate the activities and outcomes of their stewardship and investment to them.
7. Systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change, to fulfil their responsibilities
8. Monitor and hold to account managers and/or service providers

Engagement

9. Engage with issuers to maintain or enhance the value of assets
10. Where necessary, participate in collaborative engagement to influence issuers.
11. Where necessary, escalate stewardship activities to influence issuers.

Exercising Rights and Responsibilities

12. Actively exercise their rights and responsibilities.

Prusik provides investment management services to various funds ("the Funds") that pursue investment strategies and objectives that involve the funds investing in listed equities in the Asia Pacific region excluding Japan, and which do not include investment in UK listed equities.

While the Firm generally supports the objectives that underlie the Code, the Firm has chosen not to commit to the Code. The approach of the Firm in relation to engagement with issuers and their management is determined globally. The Firm takes a consistent approach to engagement with issuers and their management in all the jurisdictions in which it invests and, consequently, does not consider it appropriate to commit to any particular voluntary code of practice relating to any individual jurisdiction.

For further information on the Firm's approach please contact partner, Mark Dwerryhouse. enquiries@prusikim.com

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