

Cologne Advisors LLP
UK Stewardship Code Disclosure Statement

The FCA's Conduct of Business Sourcebook (COBS 2.2.3R), requires Cologne Advisors LLP ("Cologne"), as an Alternative Investment Fund Manager, to include a disclosure on its website stating the nature of its commitment to the UK Stewardship Code ("the Code") issued by the Financial Reporting Council ("FRC"). If the firm does not commit to the Code, it must state in general terms its alternative investment strategy. The Code sets out various principles relating to the level of engagement by investors with UK equity issuers.

The Code aims to enhance the quality of engagement between institutional investors and companies to help improve long-term returns to shareholders and the efficient exercise of governance responsibilities. It sets out good practice on engagement with investee companies and is to be applied by firms on a "comply or explain" basis. The FRC recognises that not all parts of the Code will be relevant to all institutional investors and that smaller institutions may judge some of the principles and guidance to be disproportionate. It is of course legitimate for some asset managers not to engage with companies, depending on their investment strategy, and in such cases firms are required to explain why it is not appropriate to comply with a particular principle.

Cologne's Stewardship Code disclosure

The Code requires that engagement with UK equity issuers by institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities;
- Have and disclose a robust policy on managing conflicts of interest in relation to stewardship;
- Monitor their investee companies;
- Establish clear guidelines on when and how they will escalate their activities;
- Be willing to act collectively with other investors where appropriate;
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities.

The objective of Cologne in managing the Camox fund is to provide investors with above average capital appreciation as a result primarily of long and short equity investments across Europe based upon a value investment strategy. Cologne follows a stock-picking strategy focusing on small and mid-cap European equities with sector, country and thematic diversification. The current policy of the firm in engaging with issuers and their management is determined on a portfolio-wide basis, thereby the firm takes a consistent approach to engaging with issuers in all jurisdictions the firm invests in.

We determine our approach to stewardship on a case-by-case basis, taking into account the actions that will lead to the most favourable outcome for the value of our investments.

Therefore, although Cologne supports the objectives set out within the Code, the provisions are not deemed to be proportionate to the type of investment strategy and trading currently undertaken by the firm. Should any material changes occur to the strategy which would make the Code's provisions relevant, the firm will review and amend this disclosure.