

Engagement Policy – Annual Disclosure

Structured Invest S.A. (hereafter “SI”) is a management company established under Luxembourg law and a 100% subsidiary of UniCredit Bank AG. SI is authorized under chapter 15 of the law of 17 December 2010 relating to undertakings for collective investment as amended (“Law of 2010”), and is furthermore authorized as alternative investment fund manager pursuant to chapter 2 of the law of 12 July 2013 relating to alternative investment fund managers as amended (“AIFM Law”).

In accordance with article 1sexies (1) n° 1 of the law of 24 May 2011 on the exercise of shareholders’ rights in shareholders’ meetings in listed companies (“Shareholders Rights Law”)¹, SI has developed and disclosed an Engagement Policy. Following this, article 1sexies (1) n° 2 of the Shareholder Rights Law requires SI to publish, on a yearly basis, how this Engagement Policy has been implemented, including a disclosure of a general description of voting behavior, an explanation of the most significant votes and the use of the services of proxy advisors (if any). Moreover, the annual disclosure shall include information on how SI has cast votes in the general meetings of companies in which SI managed funds (the “Funds”) hold shares.

SI discloses the following information for the reporting period covering the year 2021:

General description of voting behavior	During the year 2021, SI did not make use of the exercise of voting rights, neither directly nor via third parties (e.g., proxy advisors). In accordance with section IV. B. of SI’s Voting Rights & Engagement Policy, SI has analyzed the voting scope and decided to abstain from voting. This decision is based on an insignificant extent of the investment participation and resulting that no influence could have been achieved by exercising the voting rights.
Most significant votes	
Proxy advisor(s) used	
Information on how SI casted votes in the general meetings of companies in which the Funds hold shares	

Luxembourg, February 2022

¹ As amended by the law of 1 August 2019 transposing the requirements of the Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (“SRD II”).