# AMMEL Shareholders Rights Directive Disclosure

At Architas Multi-Manager Europe Limited ("AMMEL") we are committed to acting as a responsible investor on your behalf. This document sets out the requirements of the Shareholder Rights Directive II ("SRD II") and describes how AMMEL addresses them through our approach to shareholder engagement and voting.

Under S.I. No. 81 of 2020 the European Union (Shareholders' Rights) Regulation which came into force on 30 March 2020, asset managers such as AMMEL are required either to publish an Engagement Policy and information concerning about how we comply with the regulations, or to explain why not.

The engagement policy must describe how the firm:

(a) integrates shareholder engagement in its investment strategy,

(b) monitors investee companies on relevant matters, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance,

(c) conducts dialogues with investee companies,

(d) exercises voting rights and other rights attached to shares,

(e)cooperates with other shareholders,

(f)communicates with relevant stakeholders of the investee companies, and

(g)manages actual and potential conflicts of interest in relation to its engagement.

AMMEL as a multi-manager who manages both Manager of Manager Products and Fund of Fund Products, has adopted a proportionate approach to voting and engagement depending on the product type.

*AMMEL applies two different approaches to addressing the requirements of SRD II depending on whether assets are externally managed with voting rights retained in-house or whether assets are internally managed as funds of funds.*

## Manager of Manager Products: Externally Managed Assets with Retained Voting Rights

Where voting rights have been retained, AMMEL, as part of the BNP Paribas Asset Management (BNPPAM) group of entities, applies the BNPPAM Voting policy, in respect of shareholder voting. BNPPAM discloses engagement policies through the BNPPAM Stewardship Policy . These policies are all compliant with SRD II and full details of the BNPPAM approach are available on the BNPPAM Sustainability Information web site.

Due to the AMMEL delegation structure where discretionary management of assets is delegated to an external party and voting rights are retained, the obligations in terms of company dialogue and

engagement and voting are split. In this case, the delegate manager is responsible for engagement with investee companies while AMMEL is responsible for voting, which is managed through the BNPPAM Voting Policy referenced above.

## Fund of Fund Products: Internally Managed Assets

In this case, AMMEL does not invest directly in company shares but manages funds of funds.

Where AMMEL does not delegate management of assets to an external party and manages funds of funds internally, our approach to voting and engagement is tailored accordingly and set out in our local Voting Policy. We rely on our local Voting Policy to meet regulatory requirements.

AMMEL endeavours to vote in each instance in the best interests of their clients. Where AMMEL abstains from voting this will be in the clear interests of their clients and a rationale will be documented for this action.