

## Principles and strategies for exercising voting rights

J. Safra Sarasin Fund Management (Luxembourg) S.A. (the “Company”) is approved by the Commission du Surveillance du Secteur Financier to act as UCITS and AIF fund manager. In this function the Company ensures that the execution of voting rights follows the ethical principles of the J. Safra Sarasin Group and the UCITS and AIFM Directives as well as their implementing measures.

These key principles are:

1. Each decision follows the best interest of the fund and the fund’s investor.
2. Each decision must be made independently from third party interests or own interest of the Company.
3. Each decision must be in line with the investment policy and the investment restrictions of the relevant fund, including the framework set by the Luxembourg legislator.
4. An execution of voting rights must not harm the integrity of the markets.

The Company follows the approach that the execution of voting rights is an instrument to promote the best interest of the funds and the fund’s investors. To ensure the key principles and to define responsibilities J. Safra Sarasin Fund Management (Luxembourg) S.A. has adopted a voting rights policy. This policy guides the exercise of voting rights and gives the framework for appropriate actions in connection with the execution of voting rights.

The policy allows the Company to delegate the attendance in ordinary and extraordinary shareholder meetings via proxy to third parties, in particular to the investment manager of the funds or to proxy representatives. Such delegates must adhere to the Company’s key principles and must be furnished with written authorizations and instructions related to the execution of voting rights. Such delegations allow the Company a lean and economic management in favour and in the best interest of the investors.

## Shareholder Rights Directive (SRD II)

The aim of SRD II is to promote effective stewardship and long-term investment decision taking in relation to the investee companies. It establishes the framework in several key areas, including the transparency of engagement and proxy voting by the investment managers, and regular reporting on the implementation of such activities. The Company follows the Luxembourg implementation of SRD II as per provisions of the amended Luxembourg law of 24 May 2011 on the exercise of rights of shareholders in listed companies and as such the ownership reporting is mainly focused on the funds which invest in equities of the EU listed entities (albeit certain investment managers may also extent such disclosure to encompass other types of instruments such as debt instruments, etc.). Since the Company has delegated portfolio management of such funds to the investment managers the Investors are invited to access the latest SRD II policies and active ownership reports directly on the investment managers’ websites under the following links:

- **Sarasin & Partners LLP:**  
<https://sarasinandpartners.com/stewardship/>
- **Bank J. Safra Sarasin:**  
[https://www.jsafrasarasin.com/internet/com/com\\_index/sustainability/com\\_sustainable\\_investment/com\\_our\\_active\\_ownership\\_approach.htm](https://www.jsafrasarasin.com/internet/com/com_index/sustainability/com_sustainable_investment/com_our_active_ownership_approach.htm)

Furthermore, Investors may also request free of charge detailed information on the voting strategy at J. Safra Sarasin Fund Management (Luxembourg) S.A. 11-13, Boulevard de la Foire L-1528 Luxembourg Tel. +352 26 21 25 1, Fax +352 26 21 25 49, E-Mail: [jssfml\\_info@jsafrasarasin.com](mailto:jssfml_info@jsafrasarasin.com)