

## **ENGAGEMENT POLICY**

### **Purpose**

Helix Equities Limited (“Helix”) is authorised and regulated by the Financial Conduct Authority (“FCA”) as a full-scope UK AIFM.

From time to time, alternative investment funds (each a “Fund”, and collectively the “Funds”) managed by Helix invest in shares traded on regulated markets.

We are required to develop and publicly disclose an engagement policy which complies with the requirements set out in the FCA’s Conduct of Business Sourcebook, , in particular COBS 2.2B (transposing Article 3(g) of the EU Shareholder Rights Directive ((EU) 2017/828)), and publicly disclose on an annual basis how that engagement policy has been implemented in a way that meets the requirements (including disclosure of certain voting activities in respect of shares in investee companies) or to publish a clear and reasoned explanation of why we have chosen not to comply with any such requirements. The engagement policy must describe how Helix:

- Integrates shareholder engagement in its investment strategies;
- Monitors investee companies on relevant matters (e.g. strategy, financial, non-financial performance and risk, capital structure, social and environmental impact and corporate governance);
- Conducts dialogues with investee companies;
- Exercises voting and any other shareholder rights;
- Cooperates with other shareholders;
- Communicates with relevant stakeholders of investee companies;
- Manages actual and potential conflicts of interests in relation to Helix’s engagement.

### **Disclosure**

Helix has considered the engagement policy and concluded that it does not require an engagement policy at the moment because it does not manage investments for institutional investors that deal in UK and EU listed securities.