

Voting Rights Policy

This policy sets out the legal & regulatory requirements, as well as the related actions, which Japan Fund Management (Luxembourg) S.A. (below “JFML”) complies with in order to meet its obligations, in the area of voting rights, as management company authorised under Chapter 15 of the Law of 17 December 2010 relating to undertakings for collective investment, as amended (the “Law of 2010”) and as alternative investment fund manager authorised under the law of 12 July 2013 related to alternative investment fund managers, as amended (the “AIFM Law”), which manages undertakings for collective investment subject to Part I and Part II of the 2010 Law as well as specialised investment funds subject to the law of 13 February 2007 relating to specialised investment funds (“SIF Law”).

1. Legal & Regulatory Requirements

1.1. Voting Rights Policy

JFML develops adequate and effective strategies for determining when and how any voting rights held in the Alternative Investment Funds (each an “AIF” and together the “AIFs”) or the Undertaking for Collective Investment in Transferable Securities (the “UCITS”) portfolios it manages are to be exercised, to the exclusive benefit of the AIF or UCITS concerned and its investors.

1.2. Measures and Procedures to exercise Voting Rights

The strategy determines measures and procedures for:

- (a) monitoring relevant corporate actions;
- (b) ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the relevant AIF or UCITS; and
- (c) preventing or managing any conflicts of interest arising from the exercise of voting rights.

1.3. Disclosure of the Voting Rights Policy to Investors

A summary description of the strategies and details of the actions taken on the basis of those strategies by JFML, is made available to the investors free of charge and on their request.