

Voting Rights Policy



INTRODUCTION

Japan Fund Management (Luxembourg) S.A. (“JFML”) is a management company authorised under Chapter 15 of the Luxembourg Law of 17 December 2010, as amended, and an alternative investment fund manager authorised under the Luxembourg Law of 12 July 2013, as amended. JFML manages undertakings for collective investment subject to Part I or Part II of the Luxembourg Law of 17 December 2010, specialised investment funds subject to the Luxembourg Law of 13 February 2007, reserved alternative investment funds subject to the Luxembourg Law of 23 July 2016, as well as Irish unit trusts subject to the Irish Unit Trust Act, 1990.

The purpose of this voting rights policy (the “Policy”) is to set out the legal and regulatory requirements, as well as the related actions, which JFML has to comply with in order to meet its obligations in the area of voting rights.

POLICY

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

MEASURES AND PROCEDURES TO EXERCISE VOTING RIGHTS

The strategy determines measures and procedures for:

- Monitoring relevant corporate actions;
- Ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the relevant AIF or UCITS; and
- Preventing or managing any conflicts of interest arising from the exercise of voting rights.

DISCLOSURE OF THE VOTING RIGHTS POLICY TO INVESTORS

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