

The European Shareholder Rights Directive, as amended, requires asset managers, such as Leucadia Investment Management Limited (LIML), to either develop a shareholder engagement policy describing how the firm engages with the companies it invests in on behalf of clients or to explain why it has chosen not to develop such a policy. LIML has chosen not to develop and publish such an engagement policy at this time because it provides investment services to a relatively small number of clients to whom it reports directly. However, LIML reviews this position frequently as part of its commitment to environmental, social and good governance matters. For the same reason, LIML does not commit to comply with the UK Stewardship Code.