
EU Shareholders Rights Directive Disclosure Statement

Jefferies Asset Management Ltd.

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Supersedes all previous Disclosures regarding this subject matter

Jefferies Asset Management Ltd.

Jefferies

The European Shareholder Rights Directive, as amended, requires asset managers, such as Jefferies Asset Management Limited (JAML), 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. JAML 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, JAML reviews this position frequently as part of its commitment to environmental, social and good governance matters. For the same reason, JAML does not commit to comply with the UK Stewardship Code.