

## **EU Shareholder Rights Directive**

Under Rule 2.2B.5R of the Conduct of Business Sourcebook in the FCA Rules, Brigade Capital UK LLP (the "Firm") is required either to develop and publicly disclose an engagement policy as described in the revised Shareholder Rights Directive ("SRD II") or publicly disclose a clear and reasoned explanation of why it has chosen not to develop and adopt a shareholder engagement policy.

The Firm provides investment advisory services that focus on credit strategies, primarily high yield credit strategies and structured credit strategies. As such, the principal asset classes in which the Firm invests on behalf of its clients are bonds, bank debt and other credit instruments (including credit indices and derivatives). The Firm may also invest from time to time in publicly listed equity securities, generally in issuers which have significant levels of debt. Such listed equity investments are not a core part of the Firm's investment activities and the Firm does not seek to take an activist shareholder approach. In addition, from time to time the Firm may hold equity securities, typically unlisted, in companies as a result of debt-to-equity swaps in corporate restructurings.

As such, while the Firm is generally supportive of the objectives that underlie SRD II, the Firm does not consider a shareholder engagement policy (as described by SRD II) is appropriate in the context of the Firm's investment strategies. If the Firm's investment strategies change in such a manner that a shareholder engagement policy becomes relevant, the Firm will amend this disclosure accordingly.