

UK/EU RELATED DISCLOSURES

Commitment to the UK Stewardship Code

Pursuant to Rule 2.2.3R of the FCA Conduct of Business Sourcebook, ExodusPoint Capital Management U.K., LLP (“ExodusPoint UK”) is required to disclose whether it commits to the UK Financial Reporting Council’s Stewardship Code (the “Code”) or, where it does not commit to the Code, its alternative investment strategy. The Code is a voluntary code and sets out a number of principles relating to engagement by investors with UK equity issuers. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non-compliance.

ExodusPoint UK and its affiliates employ a global multi-strategy investment approach. Whilst ExodusPoint UK may invest in global equities, including UK equities, it is not a significant element in its investment strategies. As such, while the Code is relevant to some aspects of ExodusPoint UK’s trading, and ExodusPoint UK generally supports its principles, it is not appropriate to commit to the Code, given the nature of the Funds’ investment strategies.

Shareholder Rights Directive Statement

ExodusPoint Capital Management UK, LLP (“ExodusPoint UK”) is making this statement in Compliance with Rule 2.2B.5R of the FCA’s Conduct of Business Sourcebook (“COBS”).

COBS requires every FCA authorised asset manager that invests in listed equities to:

(1) develop and publicly disclose on its website, a copy of its engagement policy which includes the content specified in the amended EU Shareholder Rights Directive (Directive 2007/36/EC); and

(2) publicly disclose on an annual basis how its engagement policy has been implemented, including a general description of its voting behaviour, an explanation of its most significant votes and details of its use of the services of proxy advisors, or, in either case, to publicly disclose a clear and reasoned explanation of why it has chosen not to comply with those requirements.

ExodusPoint UK has considered carefully whether it wishes to adopt an engagement policy and to make the disclosures described above. ExodusPoint UK is a subadvisor within the broader structure of the ExodusPoint group, and manages assets in accordance with a multi-strategy investment approach that involves a wide variety of assets. When ExodusPoint UK invests in shares, it has a general policy not to vote proxies. There may be some limited situations where ExodusPoint UK would consider voting a proxy, but these situations are limited and subject to the firm’s policies and procedures designed to act in the best interest of our investors.

Therefore, while ExodusPoint UK supports the general principles of shareholder engagement, it does not at this time (for the reasons set out above) consider it appropriate to adopt an engagement policy with respect to the Shareholder Rights Directive. ExodusPoint UK will keep its position under review and will update this section of its website accordingly if there is a change in its approach.

Modern Slavery Act Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) in respect of ExodusPoint Capital Management UK, LLP and its affiliate, ExodusPoint Capital Management UK Technologies, Ltd (collectively, “ExodusPoint” or “we”) in respect of the financial year ended 31 December 2020.

ExodusPoint Capital Management UK, LLP is a limited liability partnership incorporated in England and Wales. It is an investment management firm, authorised and regulated by the Financial Conduct Authority. ExodusPoint Capital Management UK Technologies, Ltd is a limited company incorporated in England and Wales.

References to the term “modern slavery” in this statement includes slavery, servitude and forced or compulsory labour, and human trafficking, as defined in the Act.

ExodusPoint neither condones nor tolerates the presence of modern slavery in its business or its supply chains. Whilst we believe the risk of modern slavery taking place in our business is low, ExodusPoint has policies and procedures in place to ensure adherence with the Act and applicable law, including bribery and corruption, money laundering, employment and discrimination, whistleblowing and escalation of staff concerns or issues. ExodusPoint’s Code of Ethics reflects its commitment to acting ethically and with integrity in all areas of its business and its supply chain.

ExodusPoint has taken steps to detect potential modern slavery and human trafficking or the presence of forced labour within its business, including carrying out due diligence on all vendors and suppliers, and provides training and awareness of the Act to staff to inform them of how to take appropriate action if they suspect a case of modern slavery or human trafficking.

This statement was approved by the Members of ExodusPoint Capital Management UK, LLP and the Board of Directors of ExodusPoint Capital Management Technologies, Ltd. in July 2021.