

## UK/EU RELATED DISCLOSURES

### U.K. Stewardship Code Statement

Pursuant to Rule 2.2.3R of the Financial Conduct Authority's Conduct of Business Sourcebook, ExodusPoint Capital Management UK, LLP ("ExodusPoint UK") is required to disclose whether it commits to the UK Financial Reporting Council's Stewardship Code (the "Stewardship Code") or explain why it does not, having consideration to its investment approach.

ExodusPoint UK acts as a sub-advisor within the broader structure of the ExodusPoint group. The ExodusPoint group manages investments across a number of asset classes and markets globally following a number of diversified strategies, including assets other than UK listed equities or fixed income assets. The ExodusPoint group does not have an activist approach to its investments. In the limited cases where ExodusPoint UK does have interaction with UK investee companies, it does so in accordance with our firm policies which are designed to act in the best interests of our investors.

As such, while ExodusPoint UK generally supports the Stewardship Code and its principles, it is not appropriate to commit to it 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 2022.

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 UK Technologies, Ltd in June 2023.

### **ExodusPoint UK Tax Strategy**

"ExodusPoint Group" is a global, multi-strategy, multi-manager investment firm headquartered in New York City with operations in the UK and globally. This tax strategy sets out the ExodusPoint Group's outlook on UK taxation and applies to each of ExodusPoint Capital Management UK, LLP, ExodusPoint Services UK, Ltd and ExodusPoint Capital Management UK Technologies, Ltd (each a "ExodusPoint UK entity" and, together, "ExodusPoint UK") for the year ended 31 December 2022.

### **Approach to risk management and governance arrangements**

ExodusPoint UK emphasizes a culture of timely and accurate tax compliance, robust internal financial and tax controls, and no tolerance for undue risk taking. This effort is overseen by the Global Head of Tax and broader tax team, through close interaction across departments, and with involvement of UK and global senior management where necessary. Such collaboration ensures that the Tax team can proactively and thoroughly identify and address tax risks and obligations with proper points of escalation.

The Global Head of Tax and broader tax team escalate and address tax matters to UK and global senior management. Tax compliance is a key focus for the ExodusPoint Group, and ExodusPoint UK also relies on external UK tax advisors for their expertise where needed. In particular, careful consideration is given to the corporate criminal offense rules to ensure that ExodusPoint UK has reasonable procedures in place to prevent the facilitation of tax evasion by its associated persons.

### **Attitude to UK tax planning and management of tax risks**

ExodusPoint UK strives to be a best-in class platform for its stakeholders, which includes an emphasis on both tax efficient planning and risk management related to tax positions. While tax efficiency is sought where feasible and permissible, ExodusPoint UK prioritizes the mitigation of financial and reputational risks. ExodusPoint UK works closely with its external UK tax advisors to ensure predictable outcomes and a high degree of comfort in its business endeavours and filing positions.

### **Approach towards dealings with HMRC**

ExodusPoint UK strives for transparent and candid dialogue with HMRC and hopes to ensure timely and effective resolutions for both parties. By doing so, ExodusPoint UK hopes to build long term trust and credibility with HMRC.

The publication of this tax strategy has been reviewed and approved by the ExodusPoint Group's Head of Tax, Chief Financial Officer, and respective UK governing bodies. The tax strategy complies with ExodusPoint UK's obligations to the Finance Act 2016. Approved 6 December 2022. Published 3 January 2023