

STEWARDSHIP DISCLOSURE

Conduct of Business Sourcebook rule 2.2.3R, requires Hilbert Investment Solutions Ltd (“HIS”) to include a disclosure on its website stating the nature of its commitment to the UK Stewardship Code (“the Code”) issued by the Financial Reporting Council. If the firm does not commit to the Code, it must state in general terms its alternative investment strategy. The Code is a voluntary code and sets out various principles relating to the level of engagement by investors with UK equity investors.

Whilst HIS supports the Code’s objectives, it has decided not to commit to the principles of the Code as it does not hold any voting rights in any UK company, where this to change, HIS will reconsider its position and its compliance with the Code.