

## **Kairos Investment Management Limited**

### **Commitment to the UK Stewardship Code**

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Kairos Investment Management Limited (the "Firm") is required to include on this website a disclosure about the nature of its commitment 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.

The Firm pursues investment strategies for the funds whose assets it manages that involve it investing in European and global equities, including UK equities on a limited basis. The Code is therefore relevant to some limited aspects of the Firm's trading. While the Firm generally supports the objectives that underlie the Code, the Firm has chosen not to commit to the Code. The Firm and the Kairos group invest in a variety of jurisdictions across Europe and globally and, therefore, the approach of the Firm in relation to engagement with issuers and their management is determined on group-wide basis. The Firm and the Kairos group take a consistent approach globally to engagement with issuers and their management in all of the jurisdictions in which they invest, and always seek to engage positively with investee companies and act in the best interests of our fund investors. Consequently, the Firm does not consider it appropriate to commit to any particular voluntary code of practice relating to any individual jurisdiction.

KIM Limited  
25<sup>th</sup> July 2017