

SRD II Annual Disclosure for Period Ending 30th September 2021

TwentyFour Asset Management LLP and TwentyFour Asset Management (US) LP (together referred to as “TwentyFour”) make the below annual disclosure under obligations arising from Article 3g(1)(b) of the revised Shareholder Rights Directive (EU 2017/828) (“SRD II”) for the period up to 30th September 2021. TwentyFour’s investment strategy is to trade in fixed income products and therefore is not required to make a disclosure under the SRD II, however, TwentyFour has chosen to adopt an engagement policy and make annual disclosures setting out how the Firm has complied with this policy.

| <p>How has TwentyFour’s engagement policy been implemented in a way that meets the below requirements?</p> <p>COBS 2.2B.5R(1)(b)</p> | <p>TwentyFour has operated in line with its engagement policy over the review period. As outlined in the policy TwentyFour has monitored and engaged with investee companies to maximise bondholder value in the long-term, specifically the value of its clients’ investments.</p> <p>For the prior twelve months up to 30th September 2021 TwentyFour had the following engagements:</p> <table border="1" data-bbox="562 863 1995 1169"> <thead> <tr> <th></th> <th>Q4 2020</th> <th>Q1 2021</th> <th>Q2 2021</th> <th>Q3 2021</th> </tr> </thead> <tbody> <tr> <td>Number of Borrower Meetings/Updates</td> <td>53</td> <td>94</td> <td>83</td> <td>100</td> </tr> <tr> <td>Number of Corporate Actions</td> <td>9</td> <td>26</td> <td></td> <td>11</td> </tr> <tr> <td>Summary of Corporate Engagements</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- Environmental</td> <td>11</td> <td>13</td> <td>34</td> <td>43</td> </tr> <tr> <td>- Social</td> <td>4</td> <td>8</td> <td>7</td> <td>9</td> </tr> <tr> <td>- Governance</td> <td>11</td> <td>13</td> <td>40</td> <td>32</td> </tr> </tbody> </table> | | Q4 2020 | Q1 2021 | Q2 2021 | Q3 2021 | Number of Borrower Meetings/Updates | 53 | 94 | 83 | 100 | Number of Corporate Actions | 9 | 26 | | 11 | Summary of Corporate Engagements | | | | | - Environmental | 11 | 13 | 34 | 43 | - Social | 4 | 8 | 7 | 9 | - Governance | 11 | 13 | 40 | 32 |
|--|---|---------|---------|---------|---------|---------|--|----|----|----|-----|------------------------------------|---|----|--|----|---|--|--|--|--|------------------------|----|----|----|----|-----------------|---|---|---|---|---------------------|----|----|----|----|
| | Q4 2020 | Q1 2021 | Q2 2021 | Q3 2021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Number of Borrower Meetings/Updates | 53 | 94 | 83 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Number of Corporate Actions | 9 | 26 | | 11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Summary of Corporate Engagements | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| - Environmental | 11 | 13 | 34 | 43 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| - Social | 4 | 8 | 7 | 9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| - Governance | 11 | 13 | 40 | 32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>General description of voting behaviour.</p> <p>COBS 2.2B.7R(1)</p> | <p>TwentyFour is a fixed income manager and does not trade in equity. Therefore TwentyFour does not engage in proxy voting but may take part in corporate actions on behalf of the portfolios it manages.</p> |
| <p>How has TwentyFour cast votes in the general meetings of companies in which it holds shares?</p> <p>COBS 2.2B.7R(2)</p> | <p>As TwentyFour is a fixed income manager it does not engage in proxy voting. However, in line with the Firm's engagement policy, TwentyFour did engage with investee companies and in some instances was able to enact change or determined that it would not engage with the investee company.</p> |
| <p>An explanation of TwentyFour's most significant votes.</p> <p>COBS 2.2B.7R(1)</p> | <p>TwentyFour does not engage in proxy voting since it is a fixed income manager.</p> |
| <p>TwentyFour's use of the services of proxy advisors.</p> <p>COBS 2.2B.7R(1)</p> | <p>TwentyFour does not use the services of proxy advisors as it does not engage in proxy voting.</p> |