

G10 Capital Limited

7 March 2025

Shareholder Engagement Policy

Under COBS 2.2B.5R of the FCA Handbook, G10 Capital Limited (“G10” or the “Firm”) is required to develop and publicly disclose an Engagement Policy (per COBS 2.2B.6R) and make subsequent annual disclosures of the implementation of that Engagement Policy, OR publicly disclose a clear and reasoned explanation of why the Firm has chosen not to do so.

By way of background, G10 is a full scope Alternative Investment Fund Manager (“AIFM”) with MiFID ‘top up’ permissions, authorised and regulated by the Financial Conduct Authority (“FCA”) (Firm Reference Number (“FRN”) 648953).

In the course of its business, G10 provides:

- A regulatory hosting platform for a number of Appointed Representatives (“ARs”);
- Discretionary investment management on behalf of clients (“Clients”), funds where the Firm is appointed as portfolio manager or delegated portfolio manager to funds; and
- Alternative Investment Fund Manager (“AIFM”) services to Alternative Investment Funds (“AIFs”).

G10 does not regularly engage with the management of the companies in which it invests, due to the small size of the individual investment teams which act separately and make investment decisions on behalf of Clients with respect to shares traded on Regulated Markets. The term Regulated Markets in this instance, includes markets outside the United Kingdom where financial instruments in the form of shares are traded, where they are of a comparable quality to the Regulated Markets in the United Kingdom. However, G10 does vote on matters which relate to shares held, where those matters are considered material to promoting the interests of its Clients. The fundamental research undertaken by the Firm enables us to form views and opinions on the activities, strategy and performance of portfolio companies, and to use voting rights attached to our holdings to emphasise those views, where it is appropriate.

G10 may also engage with other shareholders and stakeholders, where it is appropriate and consistent with the strategy of the respective teams and the interests of our Clients.

The Firm is considering its position on an ongoing basis with respect to its obligations above, however, at this point the Firm does not consider that it is appropriate for it to have a formal Engagement Policy, due to the structure of its investment teams, investment approach and size.