KIMMIK CAPITAL LIMITED
STATEMENT ON THE UK STEWARDSHIP CODE

1 September 2026

1. INTRODUCTION

This statement outlines Kimmik Capital Limited's (the "**Firm's**") position with respect to the UK Stewardship Code (the "**Code**"), which was published by the Financial Reporting Council ("**FRC**") in July 2010 and amended in 2012, 2020 and 2026. Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, the Firm is required to make a public disclosure about the nature of its commitment and level of compliance to the Code or, where it does not commit to the Code, to explain its alternative investment strategy.

The Code is a voluntary framework that promotes the responsible allocation, management and oversight of capital to create long term sustainable value for clients and beneficiaries. It aims to enhance the quality of engagement between investors and the entities in which they invest. The Code encourages investors to consider long-term risks and opportunities, including impacts on the economy, environment, and society on which beneficiaries' interests depend. It is applied on an "apply and explain" basis and it outlines how asset owners and asset managers can protect and enhance the value of the investments entrusted to them.

The FRC recognises that there has been significant growth in investment in assets other than listed equity and capital is invested in a range of asset classes (e.g., fixed income, private equity, real estate, and infrastructure) over which investors have different terms and investment periods, rights and levels of influence. Hence the Code does not solely apply to equity investments.

The FRC also recognises that not all parts of the Code will be relevant to all institutional investors and that smaller institutions may judge some of the principles and guidance to be disproportionate. It is of course legitimate for some asset managers not to engage with companies, depending on their investment strategy.

The Code comprises six Principles that can be summarised as follows:

- Principle 1 – Signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries
- Principle 2 – Signatories identify and respond to market-wide and systemic risks to promote well-functioning financial markets
- Principle 3 – Signatories engage to maintain or enhance the value of assets
- Principle 4 – Signatories actively exercise their rights and responsibilities
- Principle 5 – Signatories integrate stewardship considerations into their selection and oversight of external managers
- Principle 6 – Signatories monitor and hold to account stewardship service providers

2. THE FIRM'S POSITION ON THE CODE

It should be noted that given the Firm's specialist focus on credit and opportunistic investment strategies, the number of occasions on which the Firm will be involved in UK listed equity investments will be limited. Therefore, the Code's relevance has limited applicability to the Firm's investment activities.

The Firm has chosen not to formally commit to the Code given the nature of the Firm's asset base and its investment approach.

The Firm's approach in relation to engagement with issuers and their management is determined by reference to the relevant investment strategy, asset class, jurisdiction and the rights and level of influence available to the Firm in the circumstances. Consequently, the Firm does not consider it appropriate to commit to any particular voluntary code of practice relating to any individual jurisdiction and feels that the Code is not appropriate to the Firm's business model.

However, whilst the Firm has not made a formal commitment of compliance with the Code, its alternative investment strategy, as set out above, is generally supportive of the spirit and aims of good stewardship as contained within the Code. As such, in practice, the Firm would take into consideration the principles as set out in the Code where relevant to its investment activities.

Whilst the revised Code covers a broader range of assets, the Firm does not consider it appropriate to commit to any particular voluntary code of practice and feels that the Code is not proportionate to the Firm's business model.

However, in practice, the Firm would take into consideration the principles as set out in the Code where relevant to its investment activities.

This Statement is reviewed annually and updated where necessary to reflect changes in circumstances and actual practice. Should the Firm's position change we will review our commitment to the Code and make appropriate disclosure at that time.

For further details on any of the above information please contact the Firm's Compliance Officer.