

ARANCI ADVISORS LTD.

April 2025

SRD II Annual Disclosure for Period Ending 31 December 2024

Under obligations arising from the revised Shareholder Rights Directive (EU 2017/828) ("SRD II"), as applied in the UK, a firm which trades shares on regulated and comparable markets, is required to either develop and publicly disclose an engagement policy as prescribed in COBS 2.2B.6R or disclose a clear and reasoned explanation of why it has chosen not to do so.

Aranci does not have an engagement policy because:

- (i) its Clients are regularly and routinely apprised of the investment strategies employed by Aranci;
- (ii) it has no basis for monitoring or engaging with investee companies or other stakeholders, as this would be inconsistent with the Firm's strategy and would not, in the Firm's opinion, benefit its Clients; and
- (iii) Aranci does not have, and does not intend to have, any SRD II institutional investors amongst its client base and as such does not believe that the requirements relating to institutional investors are applicable.

For further details on any of the above information, please contact Alex Morley.