

**EISER Finance Limited**  
**(the “Firm”)**

**UK STEWARDSHIP CODE DISCLOSURE STATEMENT - 2017**

Under COBS 2.2.3 of the FCA Handbook, the Firm is required to make a public disclosure in relation to the nature of its commitment to the UK Stewardship Code, which was first published by the Financial Reporting Council (‘FRC’) in July 2010 and subsequently revised in September 2012.

The Code aims to enhance the quality of engagement between asset managers and companies to help improve long-term risk-adjusted returns to shareholders and promote the efficient exercise of governance responsibilities. It also describes steps asset owners can take to protect and enhance the value that accrues to the ultimate beneficiary and sets out a number of areas of good practice on engagement with investee companies to which the FRC believes institutional investors should aspire.

The Code is directed in the first instance to institutional investors by which is meant asset owners and asset managers with equity holdings in UK listed companies.

**The Principles of the Code**

The seven principles of the Code are that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities.
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship.
- Monitor their investee companies.
- Establish clear guidelines on when and how they will escalate their stewardship activities as a method of protecting and enhancing shareholder value.
- Be willing to act collectively with other investors where appropriate.
- Have a clear policy on voting and disclosure of voting activity.
- Report periodically on their stewardship and voting activities.

The FRC encourages signatories to the Code to review their policy statements annually and update them as necessary to reflect changes in actual practice.

**UK Financial Reporting Council’s Stewardship Code**

FCA COBS Rule 2.2.3R requires FCA authorised firms to disclose whether they conform to the requirements of the UK Financial Reporting Council’s Stewardship Code (the ‘Code’). Adherence to the Code is voluntary.

The Firm does not currently invest in listed companies in the UK.

Therefore, while the Firm supports the principles of the Code, it does not consider it appropriate to conform to the Code at this time.

For further details on any of the above information, please contact Vivian Nicoli on +44 (0)207 323 7504 or by email: [vivian.nicoli@eiserinfrastructure.com](mailto:vivian.nicoli@eiserinfrastructure.com).

**EISER Finance Limited**

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