

## UK Stewardship

### **Commitment to the UK Stewardship Code**

Under Rule 2.2.3R of the FSA's Conduct of Business Sourcebook, Stark Investments (UK) LLP (the "Firm"), authorised and regulated by the Financial Services Authority in the United Kingdom ("UK"), is required to make accessible disclosure of the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or, where it does not commit to the Code, its alternative investment strategy. The Code is a voluntary code and sets out a number of principles relating to engagement by investors with UK equity issuers. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non compliance.

The Firm is affiliated with Stark & Roth LLC and its numerous related investment managers (collectively, the "Group"). The Firm pursues a multi strategy investment program that includes, among other strategies, investing in global equities, including UK equities. The Code may therefore be relevant to some aspects of the Firm's trading. While the Firm generally supports the objectives that underlie the Code, the Firm has chosen not to commit to the Code. The Firm invests in a variety of asset classes and in a variety of global jurisdictions. The approach and policies of the Firm in relation to engagement with issuers and their management are overseen at the Group levels. The Group typically takes a consistent global approach to engagement with issuers and their management in the various jurisdictions in which it invests and, consequently, does not consider it appropriate to commit to any particular voluntary code of practice relating to any individual jurisdiction.

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Incorporated in England & Wales

Authorised and regulated by the Financial Services Authority