

Proxy Voting Policy
of SMBC Nikko Investment Fund Management Company S.A.
(extract)

Proxy Voting Policy *(extract)*

SMBC Nikko Investment Fund Management Company S.A. (“the Company”) has established a proxy voting policy to set out the legal & regulatory requirements, as well as the related actions, which the Company complies with in order to meet its obligations, in the area of voting rights, as a management company authorised as Alternative Investment Fund Manager pursuant to the Luxembourg law of 12 July 2013 on Alternative Investment Fund Managers.

The Company develops adequate and effective strategies for determining when and how any voting rights held in the portfolios of the funds it manages, which qualify as alternative investment funds by the AIFM Law (each, a “Fund”, and collectively referred to as the “Funds”), are to be exercised to the exclusive benefit of the relevant Funds and their investors.

The Company has delegated the investment management of these Funds to third party investment managers (the “Investment Managers”). Each Investment Manager shall manage the assets of the Funds in accordance with the investment objectives and policies and investment restrictions set forth in the constituent documents of the Funds as well as in any contracts or agreements entered into between the Company and the Investment Manager (collectively, the “Investment Policies”).

Within the framework of delegation of the investment management function to Investment Managers, the Company has also made the decision to delegate the exercise of voting rights of the Funds to Investment Managers of such Funds and to apply the proxy voting policies, currently in force at their level. To this end, the delegation of the exercise of voting rights from the Company to each Investment Manager is formalized in the relevant investment management agreement concluded between the Company and each Investment Manager.

In order to ensure that the voting rights are exercised in accordance with the Investment Policies and, as the case may be, the instructions and guidelines of the Company, the Company has set up the following procedure:

- The central administrator provides the Company with an annual report detailing i) the voting events which occurred during the past year and ii) the way voting rights were exercised by the relevant Investment Manager with respect to each Fund. The Company then assesses the exercise of voting rights by Investments Managers to ensure the voting rights were exercised to the exclusive benefit of the Funds concerned and their investors.
- The Company requests from each Investment Manager an annual written confirmation stating that the voting rights attached to the portfolios of the Funds have been exercised over the past year in accordance with the Investment Policies and, as the case may be, the instructions and guidelines of the Company.
- The Company requests from each Investment Manager an annual written confirmation stating that no amendment was made during the past year to the proxy voting policy provided by the Investment Manager while it was entrusted with the function of exercising voting rights of the Funds it manages and, if an amendment was made, confirmation stating that such amendment does not affect the purpose of the proxy voting policy to secure the long-term economic interests of the relevant Fund.

- The Company requests from each Investment Manager an annual written confirmation stating that no conflict of interests arising from the exercise of voting rights occurred during the past year or, in case of any identified potential conflicts of interest(s), that the related potential conflict(s), as the case may be, was (were) prevented or managed.