

## Shareholder Rights Directive II (SRD II) Policy

Global Insight Solutions Limited (GIS) supports the principles of effective stewardship and corporate governance as outlined in the Shareholder Rights Directive II (SRD II). SRD II is designed to improve shareholder engagement and oversight by UK MiFID investment firms that invest in shares traded on regulated markets within the EEA or comparable markets outside of the EEA.

Under the FCA Conduct of Business Sourcebook (COBS 2.2.B.5R), firms are required to:

- Develop and publicly disclose an engagement policy meeting the requirements of COBS 2.2B.6R.
- Annually disclose how this engagement policy has been implemented (COBS 2.2B.7R).
- Alternatively, disclose why they have chosen not to comply.

Currently, GIS has determined that it does not take material positions in equity securities of listed issuers and, therefore, is not subject to the requirements of SRD II. As such, GIS does not maintain or publish an engagement policy at this time.

GIS remains committed to reviewing this position periodically and will update its policies as required should the firm's investment strategies change.

This policy was last updated on January 27<sup>th</sup> 2025.