

Shareholder Rights Directive (Directive (EU) 2017/828) (“SRD II”)

The second Shareholder Rights Directive (Directive ((EU) 2017/828)) (“**SRD II**”) applies to EU asset managers, which includes alternative investment fund managers, MiFID investment firms and UCITS management companies. As a result, the SRD II is applicable to Partners Group (UK) Management Limited (“**PGUKM**”) in its role as an UK MiFID investment firm that provides portfolio management services. Aspects of SRD II are transposed in COBS 2.2B, which dictates that PGUKM is required to either adopt and publically disclose an engagement policy where it deems such a policy necessary and appropriate, or to otherwise explain why adopting such a policy is not deemed necessary or appropriate.

PGUKM's sole investment management activity is the management of a collateralised loan obligation ('CLO'). A CLO is a single security which is backed by a pool of underlying loans. PGUKM manages the CLO, buying and selling the underlying loans, based upon their perceived attractiveness. As such, PGUKM's investment strategy predominantly involves investments in corporate credit instruments, including senior secured and mezzanine loans on behalf of the CLO. As a result, PGUKM has determined that it is not necessary or appropriate to adopt an engagement policy for the purposes of SRD II at this stage.