



171, Old Bakery Street, VALLETTA VLT1455, Malta
Tel. +356 2258 9030

<http://www.rigsavecapital.com> | info@rigsavecapital.com

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Rigsave Capital Ltd is a category 2 investment service provider regulated and supervised by MFSA
License n° C92570

ENGAGEMENT POLICY

Date of the Last Review: 23rd May 2022
Date of the Approval: 20th September 2021



Material Changes to the Engagement Policy

Date of change	Version Number	Person making the change	Page no.	Comments



Engagement Policy (the 'Policy')

1. Introduction

Rigsave Capital Limited (the 'Company') is qualified to act as a UCITS Management Company and an Alternative Investment Fund Manager as well as the provision of other MiFID investment activities to professional and retail clients. It is authorised and regulated by the Malta Financial Services Authority ('MFSA').

2. Aim of the Policy

In accordance with Article 3G of the Shareholders' Rights Directive 2017/828/EU and R4-7.9.2.1 of Part BII Investment Services Rules for Investment Services Providers (UCITS) the Company shall develop and publicly disclose an engagement policy that describes how it integrates shareholder engagement in its investment strategy in relation to its investment in EEA companies that are listed on an EEA regulated market.

3. Background of the Policy

A number of our UCITS funds, and AIFs may invest in 'shares traded on a regulated market' as prescribed within our local laws and regulations which transposed directive. For the purpose of this Policy, these shares are to be considered as shares of companies with a registered office within an EU member state with its shares traded on a stock exchange of a country within the European Economic Area ('Listed Companies').

This Engagement Policy, at minimum, shall describe how the Company:

- i. Monitors the listed company on relevant matters, including:
 - a. Strategy;
 - b. Financial and non-financial performance and risk;
 - c. Capital structure; and
 - d. Social and environmental impact and corporate governance;
- ii. Conducts dialogues with the listed companies;
- iii. Exercises voting rights and other rights attached to shares;
- iv. Corporates with other shareholders;
- v. Communicates with relevant stakeholders of the listed companies; and
- vi. Manages actual and potential conflicts of interests in relation to such engagement.

It may be the case that the Company may decide to not apply a Funds specific engagement policy and abstain from voting or to decline to vote when, on basis of a factual analysis, for instance, the cost of the exercise of a voting right exceeds the expected economic value of the effect of the vote on the underlying investment. For example, such a situation may happen when the shareholding held by the relevant UCITS in a given underlying investment is insignificant.

4. Annual Disclosures

The Company shall publicly disclose, on an annual basis, how such engagement policy has been implemented, including:

- i. A general description of voting behavior;



- ii. An explanation of the most significant votes; and
- iii. The use of the services of proxy advisors.

Provided that the Licence Holder shall publicly disclose how it has cast votes in the general meetings of listed companies in which it holds shares. Such disclosure may exclude votes that are insignificant due to the subject matter of the vote or the size of the holding in the listed Company.

5. Delegation

For compliance with the above provisions of SRD II, the Company shall rely upon the Engagement Policies of its Sub-Investment Manager to which it delegates its portfolio management activities, if any. Such Sub-Investment Manager shall publicly disclose how this policy has been implemented as per above.

6. Policy Governance

Such Policy will be subject to an annual review by the Company's Compliance Officer. The document shall be approved by the Board of Directors.

7. Investor Queries

Should you have any questions in relation to the contents of this Policy or wish to enquire further into the engagement activities of either the entities of the CISs that you are invested in for which the Company acts as a UCITS Management Company or Alternative Investment Fund Manager, kindly contact us on info@rigsavecapital.com.