

LUDGATE INVESTMENTS LIMITED

Commitment to the UK Stewardship Code

Under Rule 2.2.3R of the FSA's Conduct of Business Sourcebook, Ludgate Investments Limited (the "Firm") is required to include on this website a disclosure about 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.

The Firm provides investment advice to its client in respect of single equities. Although the Firm may engage with the management of the investee companies, it is not in a position to exert influence by exercising proxy voting rights. This responsibility rests with the client. Consequently, while the Firm supports the general objectives that underlie the Code, the provisions of the Code are not relevant to the type of activity currently undertaken by the Firm. If the Firm's investment strategy changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.