

## **Prytania Investment Advisors LLP's Commitment to the UK Stewardship Code**

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Prytania Investment Advisors LLP (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. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non compliance. We have detailed below the reasons why the firm has chosen not to commit to the Code.

The Firm pursues a macroeconomic and sector fundamental strategy that involves it investing in a variety of structured finance and private debt asset classes resulting in it not trading in single equities. While the Firm generally supports the objectives that underlie the Code, the provisions of the Code are not relevant to the type of trading 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.

For further information on the Firm's approach contact:

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### **Shareholder Rights Directive (SRD II)**

Prytania Investment Advisors LLP does not manage investments in shares which are traded on a regulated market and so the SRD II rules do not apply to it. Therefore, we have not developed a shareholder engagement policy and nor are we required to make the disclosures outlined above.

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