

InRIS UCITS Plc

1 December, 2020

Re: OBLIGATIONS UNDER DIRECTIVE (EU) 2017/828 AMENDING DIRECTIVE 2007/36/EC AS REGARDS THE ENCOURAGEMENT OF LONG TERM SHAREHOLDER ENGAGEMENT (“SRD II”)

InRIS UCITS plc (the “**Company**”) is an open-ended umbrella investment company with variable capital and segregated liability between sub-funds, which is registered in Ireland and authorised by the Central Bank of Ireland as a UCITS scheme pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 as amended.

Under Section 1110H of the Companies Act 2014 (as amended), the Company constitutes a “relevant asset manager” on the basis that its sub-funds, InRIS Parus and InRIS Perdurance Market Neutral, invest in shares of companies which have their registered offices in a member state of the European Economic Area (“**EEA**”) and which are admitted to trading on a regulated market situated or operating within the EEA (collectively referred to as “**EEA Listed Companies**”). In addition, all sub-funds of the Company may invest in EEA money market funds constituted as investment companies which are also categorised as EEA Listed Companies (the “**EEA Listed CIS**”).

Section 1100H obliges “relevant asset managers” to develop and publicly disclose an engagement policy in accordance with the provisions of that section. Alternatively the asset manager, which does not develop and publicly disclose an engagement policy, must “*publicly disclose a clear and reasoned explanation for its failure to do so*”.

Following careful consideration, the Directors of the Company have decided not to prepare and implement a shareholder engagement policy at this point on the basis that:

- In the last year, InRIS Parus and InRIS Perdurance Market Neutral have not held equity positions in EEA Listed Companies above 3% of any investee company’s issued share capital and have not participated in any proxy voting. Accordingly, InRIS Parus and InRIS Perdurance Market Neutral are deemed to exercise an insignificant influence over the investee companies.
- The sub-funds of the company invest in EEA Listed CIS for cash management purposes only and therefore such investment is not part of the investment strategy of the sub-funds.

This position will be kept under periodic review and, if applicable, will be updated to reflect any change in practice relating to engagement with EEA traded companies.

Directors: Francois Rivard (Canadian), Etienne Rouzeau (French), Charles Lacroix (French) John Skelly, Yvonne Connolly, Henri Vernhes (French), Baptiste Fabre (French)

InRIS UCITS plc is a open-ended umbrella investment company with variable capital, with segregated liability between sub-funds incorporated with limited liability in Ireland under the Companies Acts 2014 and authorised by the Central Bank of Ireland as an undertaking for collective investment in transferable securities pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352 of 2011).

Registered Office in Ireland: 33 Sir John Rogerson’s Quay, Dublin 2, Ireland

Registered in Ireland with the Registrar of Companies under number: 527368