

UK Regulatory Disclosures

UK STEWARDSHIP CODE STATEMENT

Mirabella Financial Services (MFS) and Mirabella Advisers LLP (MA) both have Part 4A permission to carry on one or more regulated activities, including managing investments for professional clients.

Pursuant to Rule 2.2.3R of the FCA's Conduct of Business Sourcebook ("COBS"), MA and MFS is required to disclose whether it commits to the UK Financial Reporting Council's Stewardship Code (the "Code") or explain why it does not, taking into consideration its investment approach. The Code is a voluntary code and sets out several principles relating to engagement by investors with UK equity issuers.

The Code includes a set of 12 '**apply and explain**' Principles for asset managers and asset owners, and a separate set of 6 Principles for service providers. The Code aims to enhance the quality of engagement between institutional investors and companies to help improve long-term returns to shareholders and improve governance responsibilities.

MA and MFS, offers regulatory hosting solutions covering portfolio management and execution activities as well as advisory and marketing activities. Based on MA and MFS's business models and the types of designated investment business they provide, it would not be suitable to apply the UK Stewardship Code on such a variety of activities and investment strategies deployed across a broad range of asset classes and clients.

On this basis, ACA Mirabella **does not commit** to the Financial Reporting Council's Stewardship Code (the "Code"). However, the firm supports and promotes the principles of the Code internally and with relevant service providers.