

## **Sound Point Capital Management UK LLP's Commitment to the UK Stewardship Code**

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Sound Point Capital Management UK 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 credit strategy that involves it investing in global equities, including UK equities. The Code is therefore relevant to some aspects of the Firm's trading. While the Firm generally supports the objectives that underlie the Code, the Firm has chosen not to commit to the Code. It is not the Firm's policy to engage with issuers or management as we take relatively small positions and are not seeking to add value via our engagement with the issuer.

For further information on the Firm's approach contact: [compliance@soundpointcap.com](mailto:compliance@soundpointcap.com)

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

SRD II aims to promote effective stewardship and long-term investment decision making, in respect of shares traded on EEA regulated markets and comparable regulated markets outside the EEA. It came into effect on 10 June 2019.

The rules require asset managers, who invest in shares traded on a regulated market detailed above, to:

- Publish their shareholder engagement policy (or explain why they don't have one) – COBS 2.2B.5R.
- Make annual public disclosures relating to the implementation of their shareholder engagement policy, from 10 June 2020 – COBS 2.2B.5R.
- Make disclosures to asset owners, including how their investment strategies contribute to the medium to long term performance of their assets – COBS 2.2B.9R.

Sound Point Capital Management UK LLP ("Sound Point" or "the Firm") is currently considering the impact of these rules on its regulated business in order to determine whether it needs to develop a shareholder engagement policy. This statement will be updated as soon as a decision is made.