

## **Shareholder Engagement Policy**

This statement provides AKO's approach with regards to each requirement as set out under Article 3g of the new European Shareholder Rights Directive II (SRD II).

### **Integration of shareholder engagement in AKO's investment strategy**

AKO Capital LLP serves as the Investment Manager to several investment funds (the "AKO Funds").

Our aim is to grow capital over the long term.

Our investment philosophy is to own the best assets for the long term.

We believe that if a company is run well and has good corporate governance it is more likely to be successful in the long-term.

We follow a stock picking approach underpinned by fundamental, intelligence-based research, mainly conducted in-house. We rely primarily on proprietary qualitative fundamental research supported by quantitative methods.

A key part of our investment process is engagement with company management to better understand their businesses, including their approach to governance and social and environmental issues.

We are mindful that the level of engagement permitted by companies varies and depends on a number of factors including, but not limited to, the size of our investment relative to the company's total capital.

### **Monitor investee companies on their strategy, financial and non-financial performance and risk, capital structure**

A key element of AKO's investment process is the continued monitoring of investments.

Each AKO Investment Analyst is responsible for monitoring a number of specific portfolio companies.

Ongoing monitoring includes, but is not limited to:

- Regular meetings with company management;
- Attending company shareholder events such as capital market days, quarterly conference calls and roadshows; and
- Internal analysis of publically available data.

### **Monitor investee companies on social and environmental impact and corporate governance**

Responsible investing is a deeply embedded part of the investment process.

AKO is committed to maintaining an investment approach that incorporates ESG matters and as such is a signatory of the United Nations-supported Principles for Responsible Investment ("UNPRI").

We use a third party service that rates companies on ESG factors to monitor all our portfolio companies. We track these ratings on an ongoing basis and compare them to the universe and their peers.

During our regular meetings with company management we may, if deemed necessary, specifically raise ESG matters with them.

### **Conducts dialogue with investee companies**

AKO strives for a close working relationship with investee companies with regular dialogue and interactions.

Efforts are also made to attend any capital markets days hosted by a portfolio company and should a company participate in a sell-side led roadshow, AKO will, if appropriate, seek to meet with the company during the roadshow.

Ideally AKO prefers interactions with companies to be confidential and on a one-to-one basis. However, sometimes the only interaction offered is a group meeting or call.

AKO's policy is not to be made an insider and, as such, our dialogue with companies is conducted in such a way as to manage and mitigate the risk of being told price sensitive non-public information. We expect companies and their advisers to adhere to our policy in this regard.

### **Exercising voting rights and other rights attached to shares**

AKO Capital LLP as Investment Manager to the AKO Funds is permitted to vote on behalf of the Funds.

As AKO's investment philosophy is founded on investing in the best companies with high-class management, where it decides to vote, it is usually inclined to vote with management.

However, there are exceptions to this general approach.

AKO has determined that it is in the best interests of certain of the AKO Funds to gain exposure to certain company shares, by entering into Contracts for Difference ("CFDs") with one of the Funds' Prime Brokers in place of owning the actual shares. In these cases the AKO Funds do not actually own the physical shares and therefore we are not entitled to their associated voting rights.

As the Prime Broker typically holds the actual physical shares as a hedge to our CFD position, we may from time to time ask the Prime Broker to vote on our behalf. However, this is not always possible; the Prime Broker's physical position may not match our own as they will be looking at their net holding in the underlying shares across their entire client base, not just at the position attributable to the AKO Funds.

AKO's overriding principle is to act in the best interests of the AKO Funds and so where we believe management's recommendations are not in the long term best interests of the AKO Funds we will consider voting against such proposals. Alternatively, we may seek to sell our shares in the company.

As noted above, there is no guarantee AKO will always vote. In determining if, when and how the voting rights should be exercised, AKO will usually consider the following factors:

- the percentage of the share capital held of the issuer;
- the size of the position in the portfolio;
- the country in which the issuer has its registered office;
- the strategy behind the decision to invest in that particular stock and the impact of the resolutions on that thesis; and
- the administrative costs or any other related costs.

AKO will attend some but not all company general meetings. As such, when it votes it will sometimes be done in person and sometimes via a proxy.

AKO's policy is generally not to disclose our voting intentions to any party unless there are exceptional circumstances including, but not limited to, a request from company management.

AKO's policy is also not to publically disclose our voting record for reasons of confidentiality and the risk of disclosure of sensitive portfolio information. We may, however, consider a request for disclosure from an investor in one of our Funds.

Where it is in the AKO Funds' best interests, we may arrange to lend out company shares. In such cases we believe the financial upside outweighs the requirement to vote. However, should we decide it is in the Funds' best interests to vote, we will seek to recall such shares so that we may do so.

#### **Cooperates with other shareholders**

AKO typically prefers to engage with companies directly and on a confidential basis. However, where we believe it is in the best interests of the AKO Funds we may speak with other significant shareholders and/or investor groups.

We will not normally agree to vote in concert with other shareholders.

#### **Communicates with relevant stakeholders of the investee companies**

Our communications to relevant stakeholders will be undertaken in the same way and with the same controls as if we were talking to the company itself.

#### **Manages actual and potential conflicts of interest in relation to our engagement**

It is a fundamental objective of AKO to act in the best interests of the AKO Funds and the investors in those funds at all times. This is a key part of our duty of care to our clients.

As part of this objective we have in place a comprehensive Conflicts of Interest Policy and Register which sets out the steps we take to identify, manage and mitigate actual and potential conflicts of interest.

This policy will be made publically available via our website and will be reviewed on at least an annual basis.