

SRD II Annual Disclosure for Period Ending 30th September 2024

TwentyFour Asset Management LLP (“24AM” or the “Firm”) and its group companies (meaning the Firm and its subsidiaries, collectively “TwentyFour”) make the below annual disclosure under obligations arising from Article 3g(1)(b) of the revised Shareholder Rights Directive (EU 2017/828) (“SRD II”) for the period up to 30th September 2024. TwentyFour’s investment strategy is to trade in fixed income products and therefore is not required to make a disclosure under the SRD II, however, TwentyFour has chosen to adopt an engagement policy and make annual disclosures setting out how the Firm has complied with this policy.

<p>How has TwentyFour’s engagement policy been implemented in a way that meets the below requirements?</p> <p>COBS 2.2B.5R(1)(b)</p>	<p>TwentyFour has operated in line with its engagement policy over the review period. As outlined in the policy TwentyFour has monitored and engaged with investee companies to maximise bondholder value in the long-term, specifically the value of its clients’ investments.</p> <p>For the prior twelve months up to 30th September 2024 TwentyFour had the following engagements:</p> <table border="1" data-bbox="562 903 1995 1209"> <thead> <tr> <th></th> <th>Q4 2023</th> <th>Q1 2024</th> <th>Q2 2024</th> <th>Q3 2024</th> </tr> </thead> <tbody> <tr> <td>Number of Borrower Meetings/Updates</td> <td>41</td> <td>50</td> <td>84</td> <td>79</td> </tr> <tr> <td>Number of Corporate Actions</td> <td>28</td> <td>12</td> <td>31</td> <td>20</td> </tr> <tr> <td>Summary of Corporate Engagements</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- Environmental</td> <td>15</td> <td>12</td> <td>16</td> <td>17</td> </tr> <tr> <td>- Social</td> <td>10</td> <td>1</td> <td>10</td> <td>10</td> </tr> <tr> <td>- Governance</td> <td>7</td> <td>12</td> <td>7</td> <td>10</td> </tr> </tbody> </table>						Q4 2023	Q1 2024	Q2 2024	Q3 2024	Number of Borrower Meetings/Updates	41	50	84	79	Number of Corporate Actions	28	12	31	20	Summary of Corporate Engagements					- Environmental	15	12	16	17	- Social	10	1	10	10	- Governance	7	12	7	10
	Q4 2023	Q1 2024	Q2 2024	Q3 2024																																				
Number of Borrower Meetings/Updates	41	50	84	79																																				
Number of Corporate Actions	28	12	31	20																																				
Summary of Corporate Engagements																																								
- Environmental	15	12	16	17																																				
- Social	10	1	10	10																																				
- Governance	7	12	7	10																																				

<p>General description of voting behaviour.</p> <p>COBS 2.2B.7R(1)</p>	<p>TwentyFour is a fixed income manager and does not trade in equity. Therefore TwentyFour does not engage in proxy voting but may take part in corporate actions on behalf of the portfolios it manages.</p>
<p>How has TwentyFour cast votes in the general meetings of companies in which it holds shares?</p> <p>COBS 2.2B.7R(2)</p>	<p>As TwentyFour is a fixed income manager it does not engage in proxy voting. However, in line with the Firm's engagement policy, TwentyFour did engage with investee companies and in some instances was able to enact change or determined that it would not engage with the investee company.</p>
<p>An explanation of TwentyFour's most significant votes.</p> <p>COBS 2.2B.7R(1)</p>	<p>TwentyFour does not engage in proxy voting since it is a fixed income manager.</p>
<p>TwentyFour's use of the services of proxy advisors.</p> <p>COBS 2.2B.7R(1)</p>	<p>TwentyFour does not use the services of proxy advisors as it does not engage in proxy voting.</p>