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Engelwood Asset Management S.A. acts as the Investment Manager of Omega Trust Umbrella Fund plc (the Fund), an open-ended umbrella type investment company with variable capital authorized by the Central Bank of Ireland.

Under Section 1110H of the Companies Act 2014 (as amended) ,Omega Trust Umbrella Fund plc constitutes a "relevant asset manager" on the basis that it may invest in shares that are traded on one or more EU regulated markets on behalf of funds under management. Section 1100H obliges "relevant asset managers" to develop and publicly disclose an engagement policy in accordance with the provisions of that section. Alternatively, a relevant asset manager that 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 board of Directors of the Fund has determined that a shareholder engagement policy is not required at this point because the Fund's investment strategy means that it has only minimal exposure to equities that are traded on exchanges in the European Economic Area (EEA).
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.

*Under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial service sector ("**SFDR**"), the Fund is not under any obligation to nor does it currently promote environmental or social characteristics or have sustainable investment as its investment objective. As a result, the Fund is considered to be a non-ESG funds. Furthermore, the Investment Manager has determined that sustainability risk (which is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the relevant investment (an "ESG Event")) is not considered relevant for the Fund due to the profile of the underlying investments of the Funds.*