



**Steadview Capital UK LLP  
(‘the Firm’)**

**UK Stewardship Code Disclosure**

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### **UK Stewardship Code and Shareholders Rights Directive II – Steadview Capital UK LLP**

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Steadview Capital 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.

The seven principles of the Code are that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities;
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship;
- Monitor their investee companies;
- Establish clear guidelines on when and how they will escalate their activities;
- Be willing to act collectively with other investors where appropriate;
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities.

The Firm provides investment management services to various funds ("the Funds") that pursue investment strategies that do not involve investing in EU or UK listed equities. While the Firm generally supports the objectives that underlie the Code, the provisions of the Code are primarily not relevant to the type of investment activity undertaken by the Firm. Should any of these factors change, we will review our commitment to the Code at that time and make appropriate disclosure.

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

### **The Shareholder Rights Directive II**

The Shareholder Rights Directive II (SRD II) is a European Union (EU) directive, and aims to encourage effective stewardship and long term decision making, involving transparency on engagement policies and investment strategies between traded companies and investors. SRD II applies to asset managers including full scope Alternative Investment Fund Managers that invest in shares traded on a regulated market in the EEA as well as 'comparable' markets situated outside of the EEA. Firms in scope must comply or explain basis develop and publicly disclose an engagement policy, and annually disclose how the engagement policy has been implemented including a general description of voting behaviour.

Steadview Capital LLP provides investment management services to various funds ("the Funds") that pursue investment strategies that do not involve investing in EU or UK listed equities. As such an engagement policy is not appropriate to the investment strategies for our funds.