

## **IMPLICATION POLICY**

### **Statement in Relation to Engagement Policy under the Shareholder Rights Directive 2017/828/EU of the European Parliament and of the Council of May 17th, 2017 amending Directive 2007/36/EC (SRD II)**

Pursuant to the provisions of SRD II and its transposition in Spain through the amendment of Law 22/2014, of 12 November, private capital entities, other closed-end collective investment entities and management companies of closed-end collective investment entities, and which amends Law 35/2003, of 4 November, on Collective Investment Undertakings ("**LCR**"); MCH Private Equity Investments S.G.E.I.C., S.A. ("**MCH**"), must, either publish on its website an engagement policy describing how it integrates shareholder engagement in the investment policies and strategies of the investments performed by its managed Private Equity Funds and Closed-end Investment Funds ("**PEF**" and "**CEF**", respectively, and jointly referred to as the "**Funds**"), in companies the shares of which are admitted to trading on a regulated markets situated or operating in a Member State, or publish a clear and reasoned explanation as to why it has not done so.

MCH has chosen not to develop an engagement policy and publicly disclose such a policy on its website for the reasons set out below:

1. In accordance with the LCR and the respective management regulations of the Funds managed by MCH, the investment policy of the Funds managed by MCH is mainly focused on the investment on companies with a high potential for growth and appreciation, in the development-capital phase and in so-called buyout transactions, which at the time of the acquisition of the holding are not listed on the first market of the Stock Exchanges or any other equivalent regulated market in the European Union. Furthermore, MCH does not itself invest in companies which have their registered office in a European Union member state and the shares of which are admitted to trading on a regulated market situated, or operating, in a member state.
2. As at the date of this statement, only the CEF managed by MCH has a holding in a company the shares of which are admitted to trading on a regulated market situated or operating in a Member State. MCH has chosen not to develop an engagement policy under the SRD II, in consideration of the small percentage that such investment vehicle holds in the company, which, together with the temporary nature of the investment, means that there is minimal impact at the decision-making level (in terms of the exercise of voting rights).
3. As of the date of this statement, MCH has not entered into any asset management service agreement with insurance companies or pension plans and funds.
4. This statement, and therefore MCH's decision on the development and implementation of the engagement policy, is subject to review, update or amendment in the light of the evolution of the investment policies of the Funds.

In Madrid on July 12th, 2021

MCH Private Equity Investments SGEIC, S.A.