

## **Statement on Shareholder Engagement Policy under SDR II and Finnish AIFM Act (162/2014) Chapter 7 Section 6a**

Under Directive (EU) 2017/828 (SRD II), as implemented in Finland through the Finnish Act on Alternative Investment Fund Managers (162/2014) and specifically Chapter 7 Section 6a, AIFMs that invest in shares admitted to trading on a regulated market must either adopt and publish a shareholder engagement policy, or publish a clear and reasoned explanation for not doing so.

Vaaka Partners Oy manages private equity buyout funds that acquire and manage controlling interests in unlisted companies in Finland and other EU member states. Our funds' investment strategy is focused on value creation in unlisted companies through active ownership.

In limited circumstances, our funds may temporarily acquire listed shares. The funds may invest in the shares of a listed company in order to execute a so-called take-private acquisition, for the purpose of delisting the company. Additionally, the funds may list a previously unlisted portfolio company on a regulated market as part of the exit process. Such investments in listed shares are incidental, short-term, and not part of a continuing listed-equity investment strategy. Therefore, they do not constitute such ongoing engagement with listed companies that is contemplated by the regulations.

Since our AIFs do not hold listed shares on a long-term basis, our investment strategy is entirely focused on unlisted companies, and any listed-equity exposure is transitional and non-strategic, adopting a shareholder engagement policy would be neither necessary nor appropriate.