

M7 Real Estate Financial Services Limited

UK Stewardship Code Disclosure

January 2020

Under COBS 2.2.3 of the Financial Conduct Authority's Handbook, M7 Real Estate Financial Services Limited ("M7FS") is required to make a public disclosure in relation to the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or any alternative investment strategy that it takes on.

The Code aims to enhance the quality of engagement between institutional investors and the companies they invest in with the intention of improving long term returns for shareholders and the efficient exercise of governance responsibilities.

The Financial Reporting Council ("FRC") recognises that not all parts of the Code will be relevant to all institutional investors and that smaller institutions may judge some of the principles and guidance to be disproportionate. Whilst it is legitimate for asset managers not to engage with companies, depending on their investment strategy, an explanation of non-compliance is required.

M7FS offers real estate investment management to primarily institutional investors. As a manager of real estate, M7FS acts as an investment manager which principally invests in the privately held equity and/or debt issued in respect of Real Estate projects.

Whilst M7FS supports the Code's objectives, as M7FS does not invest in UK-listed companies, the provisions of the code are not relevant to its investment strategy. Hence, M7FS does not commit to the principles of the Code.

Should there be any material changes to the investment strategy of M7FS, which would render the Code relevant, this disclosure will be revised.

For further details on any of the above information, please contact Katie King at Katie.King@m7re.eu.