

THREADNEEDLE MANAGEMENT LUXEMBOURG S.A.

SHAREHOLDER ENGAGEMENT POLICY

With reference to the requirements of the Shareholders Rights Directive II (Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017), Threadneedle Management Luxembourg S.A. has adopted the Columbia Threadneedle Investments Stewardship Principles & Approach as its engagement policy in respect of investment in shares traded on a regulated market situated or operating within a Member State, the implementation of which is delegated to Threadneedle Asset Management Ltd as asset manager.

The Columbia Threadneedle Investments Stewardship Principles & Approach is available at the following location:

https://www.columbiathreadneedle.co.uk/media/1020104/en_frc_compliance_statement.pdf