Disclosure Statement Directive (EU) 2017/828 (the "Shareholders' Rights Directive II") – AlTi UK
June 2025

Last reviewed 12 June 2025

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1. INTRODUCTION

1.1 Each of AlTi Wealth Management (UK) Limited (**AWM**), AlTi RE Limited (**ARE**) and Alvarium Fund Managers (UK) Limited (**AFM**) (collectively referred to as "AlTi UK") is an "asset manager" as such term is defined in the Shareholders' Rights Directive II. In accordance with Article 3G of the Shareholders' Rights Directive II and COBS 2.2B.5, this disclosure statement is intended to confirm that AlTi UK will not be developing and publicly disclosing an engagement policy, and to explain the basis of AlTi UK's approach.

2. STATEMENT

2.1 The discretionary management services provided by AWM to clients focusses on investing in collective investments. The FCA Policy Statement 19/13 clarifies that the scope of the rules contained in the Shareholders' Rights Directive II apply only to investing in shares traded on a regulated market. AWM does on occasion invest in shares which are traded on a regulated market; however, these types of investment form a minority of the investments made by AWM on behalf of its clients in its capacity as a discretionary manager. Where AWM does invest (on behalf of its clients) in the shares of an entity which are traded on a regulated market, such investments will typically form in a very small proportion of the shares issued by that entity.

2.2 As such, AWM has taken the view that the creation of an engagement policy would not be a proportionate measure to address the underlying objective in the Shareholders' Rights Directive II of promoting shareholder engagement. AWM will continue to review appropriate market practice information and relevant developments to assess whether an engagement policy should be created.

2.3 AWM also acts as the delegated investment manager to Alternative Investments Access ICAV (an Irish collective asset management vehicle) and each of its sub-funds. Investing in shares that are traded on a regulated market does not form part of the investment strategies pursued by the sub-funds and so AWM's activities as the discretionary investment manager of each of the sub-funds are also outside the scope of the Shareholders' Rights Directive II.

2.4 ARE provides corporate finance advisory services and has a collective portfolio management investment firm permission. ARE does not invest in shares traded on a regulated market on behalf of its clients or investors; therefore, it is outside the scope of the Shareholders' Rights Directive II.

2.5 AFM provides alternative investment fund management and authorised corporate director services to a real estate fund. AFM does not invest in shares traded on a regulated market on behalf of the fund; therefore, it is outside the scope of the Shareholders' Rights Directive II.

3. CONTACT

3.1 If you have any questions or would like any further information about AlTi UK's approach to the Shareholders' Rights Directive II, please contact:

3.1.1 **AlTi RE Limited & Alvarium Fund Managers (UK) Limited** – David.Dowell@alti-global.com

3.1.2 **AlTi Wealth Management (UK) Limited** – David.Cast@alti-global.com

4. REVIEWS AND UPDATES

4.1 This Statement will be reviewed and updated as appropriate and in response to changes of legislation, internal policies, technology, increased risks, or new vulnerabilities.

Date	**Reviewer**	**Summary of review** [reason for review, changes made]
June 2025	UK Compliance	Statement review and update