

Shareholder Rights Directive

Tabula Investment Management Limited

Article 3(g) of Directive 2007/36/EC as amended by Directive (EU) 2017/828 (together with the relevant national implementing regulations, the “SRD”) requires asset managers to adopt on a “comply or explain” basis an engagement policy describing how an asset manager integrates in its investment strategy shareholder engagement relating to companies that have a registered office in the EU and are listed on EU regulated markets (“EU investee companies”). Tabula ICAV is an asset manager for the purposes of SRD but does not actively invest in the shares of EU investee companies. On this basis, Tabula ICAV has determined that it is not appropriate to adopt an engagement policy for the purposes of the SRD.