

General Provisions

This Disclosure has been developed accordingly to the Estonian and EU regulation, the documents regulating the Company's activities in the securities market and internal regulations of the Company.

Regulation (EU) 2019/2033 requires investment firms to publicly disclose information on their investment policy, in order to provide transparency to their investors and the wider market participants on their influence over the companies in which they hold directly or indirectly shares to which voting rights are attached and on how they vote.

This disclosure includes information on the proportion of voting rights attached to the shares held directly or indirectly by the investment firms, information on their voting behavior, an explanation of votes and the ratio of proposals put forward and approved, information on the use of proxy advisor firms and information on their voting guidelines.

This Disclosure is made as of 31/12/2021 for KIT Finance Europe, LEI 549300HXOCTXFFW8RD19 a consists of the following parts:

Disclosure of proportion of voting rights

Country	Economic sector	Company name	Company identifier	Proportion of voting rights attached to shares held directly or indirectly
Russia	Chemistry	ХимикоМеталлЗавод, ПАО ап01	-	6.00%
Russia	Construction	Завод КПД-2, АО ао01	-	5.70%

Disclosure of voting behavior

Row	Item	Value
1	Departments or roles in the investment firm that take part in deciding a voting position	No departments nor employees are involved in the decision taking of voting position
2	Description of the validation process for negative votes	NA
3	Number of full time equivalents used to analyse resolutions and examine voting records, excluding external resources such as proxy advisor firms	The Company votes only as instructed by the Client
4	Explanation of any material change in the rate of approval	NA
5	List of publicly available investment policy documents describing the investment firm's objectives	NA
6	If relevant, certification of the firm's investment policy	NA

Disclosure of explanation of the use of proxy advisor firms

No proxy advisor firms is used by the Company

Disclosure of voting guidelines

No guidelines are given to the Clients. Clients exercise their voting rights based on own decision.