

# TR3A Asset Management ENGAGEMENT POLICY

December 2021

*Our commitment to value creation and sustainability through a responsible use of our voting rights.*

# ENGAGEMENT POLICY

## CONTENTS

<b>Article I.</b>	<b><i>Introduction</i></b> .....	<b>2</b>
Section 1.01	Message from the Executive Chairman .....	2
Section 1.02	Commitment to responsible management .....	3
<b>Article II.</b>	<b><i>Approach to the engagement activity</i></b> .....	<b>3</b>
Section 1.03	Conceptual framework.....	3
Section 1.04	Description of the team in charge of the engagement activity.....	3
Section 1.05	Guiding principles of the engagement activities .....	3
<b>Article III.</b>	<b><i>Implementation of the engagement activity</i></b> .....	<b>4</b>
Section 1.06	Engagement procedure .....	4
Section 1.07	Subject matters of the engagement activity .....	5
Section 1.08	Engagement methods .....	6
<b>Article IV.</b>	<b><i>Transparency and annual reports</i></b> .....	<b>6</b>

## Artículo I. Introduction

### Sección 1.01 Message from the Executive Chairman

As asset and pension fund's management companies committed to creating sustainable value, TREA ASSET MANAGEMENT SGIIC, S.A. and y TREA PENSIONES EGFP, S.A. ("**Trea**" or "**Management Company**") understands that the administration and control of our portfolio companies must safeguard certain critical issues that will ensure the optimal financial performance and reputation of those companies. In Trea's view, corporate strategy or an appropriate composition of the board of directors are some of the essential criteria which help avoiding that shareholder rights and the good health of a company are undermined.

In 2021, Trea will take the steps needed and relevant in order to strengthen the engagement process vis-à-vis our portfolio companies. In this sense, the Management Company considers the environmental, social and corporate governance criteria ("**ESG**") as integrated in the risk management strategy.

This Engagement Policy has been adopted with a view to widening our understanding of our positioning on ESG issues, our internal procedures and our commitment to transparency.

With kind regards,  
Carlos Tusquets  
Executive Chairman

## Sección 1.02 Commitment to responsible management

Institutional investors and asset managers are the stewards of the health of financial markets. Trea believes that there is no single corporate model for all companies, but it acknowledges the existence of some fundamental corporate governance principles that must be promoted by it as part of its fiduciary duty to preserve and add value, not only to the assets under management, but also to the growth and sustainability of the business fabric. This Engagement Policy ("**Policy**") is an integral part of the commitment to responsible management.

### Artículo II. Approach to the engagement activity

## Sección 1.03 Conceptual framework

This Policy provides a general description of the Management Company's expectations concerning the administration and control practices adopted by investee companies globally. Engagement activities are an integral part of the responsible management strategy (*stewardship*), together with the Sustainability Policy and the Voting Policy.

## Sección 1.04 Description of the team in charge of the engagement activity

Trea has an interdisciplinary team comprised by the members of the analysis, investment and operations teams. The Sustainability Committee, whose composition and functions are described in Annex II to our Sustainability Policy (Sustainable Principles and ESG Risk Integration), will be responsible for the preparation, updating, implementation and supervision of this Policy.

## Sección 1.05 Guiding principles of the engagement activities

The general purpose of all engagement activities with listed companies is to maximize and preserve the long-term value of our and our clients' assets. Trea recognises the value of engaging in a direct dialogue with listed companies. Based on the asset volume,

we will give priority to dialogue on those areas where we think we can have a real impact. In Trea's view, voting right is, besides direct dialogue, the most relevant engagement tool.

Artículo III. Implementation of the engagement activity

### Sección 1.06 Engagement procedure

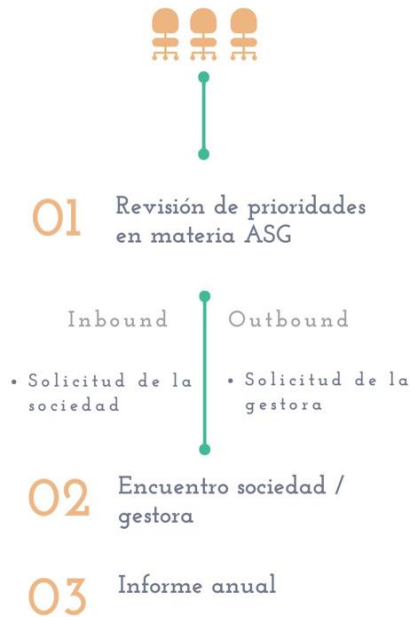
Every year, the Sustainability Committee will prepare a list of goals on the most relevant ESG matters, which will constitute the basis for direct dialogue. At the same time, the voting activity of the previous year will be revised in order to identify any companies that may be a cause for concern. The combination of these two elements will represent our active engagement universe (*outbound* process).

The Sustainability Committee will also evaluate the dialogue requests received from listed companies (*inbound* process). Listed companies wishing to request a dialogue process with the Management Company on ESG matters may send a request letter to the Sustainability Committee including this information:

- Company's identification (Ticker, Sedol, etc.)
- Subject matter of the requested dialogue
- Name and position of the persons representing the company
- All requests must be send to: [csostenibilidad@treaam.com](mailto:csostenibilidad@treaam.com)

Listed companies should understand that Trea does not involve in engagement processes during the shareholder meeting season except in exceptional cases, and that the dialogue must always adhere to local and international market abuse rules. Trea may proceed to the dialogue process in an indirect way, through qualified representatives.

## Comité de Gestión del Voto



### Sección 1.07 Subject matters of the engagement activity

As mentioned in Section 1.06, engagement priorities will be defined every year. The subject matters will correspond to the corporate governance, environmental and social areas. For more information about our priorities, companies are invited to read our Sustainability Policy and our Voting Policy.

## Gobierno Corporativo



## ENGAGEMENT POLICY

### Sección 1.08 Engagement methods

Trea will decide, on a case-by-case basis, the methods it may consider adequate for the engagement process with listed companies, which may include the following:



#### Artículo IV. Transparency and annual reports

Trea is committed to the transparency in responsible management activities, including engagement activity. An annual report will be available to our clients and the wider market in our corporate web site. <https://treaam.com>