



**Gemini Capital Management (Ireland) Limited  
(the “Company”)**

**SHAREHOLDER ENGAGEMENT POLICY**

**10 JUNE 2019**

It is the Policy of the Company to rely on the policies of each of the Investment Managers of the Sub-Funds under the GemCap Investment Funds (Ireland) PLC umbrella.

The Company engages with each of the Investment Managers of the Sub-Funds under the GemCap Investment Funds (Ireland) PLC umbrella to ensure that their policies cover the following:

- (i) monitoring investee companies on strategy, financial and non-financial performance, risk, capital structure, social and environmental impact and corporate governance;
- (ii) conducting dialogues with investee companies;
- (iii) exercising voting rights;
- (iv) cooperation with other shareholders and other stakeholders of the investee companies;  
and
- (v) managing actual and potential conflicts of interests in respect of their engagement.