

SAM Capital Partners Limited UK Stewardship Code Disclosure

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, SAM Capital Partners

Limited (the "Firm") is required to include on this website a disclosure about the nature of

its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or,

where it does not commit to the Code, its alternative investment strategy. The Code sets

out a number of principles relating to engagement by investors with UK equity issuers, as

follows:

The seven principles of the Code are that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities;
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship;
- Monitor their investee companies;
- Establish clear guidelines on when and how they will escalate their activities;
- Be willing to act collectively with other investors where appropriate;
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities.

The Firm pursues investment strategies to which the aims of the Code are not relevant.

The Delta Fund strategy does not result in it trading in single equities.

Our UK L/S strategy pursues technical & quantitative trading strategies which we have

developed in-house and that make all our investment trading decisions.

Investment holding

periods are determined solely by the proprietary models, which do not consider corporate

governance issues.

Consequently, while the Firm supports the general objectives that underlie the Code, the

provisions of the Code are not relevant to the type of trading currently undertaken by the

Firm. If the Firm's investment strategy changes in such a manner that the provisions of the

Code become relevant, the Firm will amend this disclosure accordingly.

For further information on the Firm's approach contact:

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