



# Shareholder Voting Rights and Engagement Policy

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[www.newalpha.net](http://www.newalpha.net)

**New Alpha Asset Management**, société par actions simplifiée au capital de 2 435 540 €  
450 500 012 RCS Paris · N° TVA: FR 18450500012 · Société de gestion de portefeuille agréée par  
l'AMF sous le n° GP 05000001 du 20/01/2005 · [www.amf-france.org](http://www.amf-france.org)

**NEW ALPHA**  
ASSET MANAGEMENT



## Voting Rights Policy

New Alpha Asset Management always acts on behalf of the Investors and is solely authorized to exercise voting rights and any other rights attached to the underlying investment vehicles in the Funds it manages. New Alpha Asset Management is empowered to represent the Funds it manages to third parties, as well as to act or defend in court in the interest of the Investors of these Funds. In the voting process, New Alpha complies with ESG principles and good governance practices.

New Alpha Asset Management adheres to its policy on the use of voting rights attached to the securities held by the Funds it manages, in accordance with Article 319-21 of the AMF Regulation and updated as necessary. For each Fund, New Alpha Asset Management reports on this in the annual report of the relevant Fund.

In Private Equity funds, New Alpha Asset Management, its officers and employees involved, may be appointed as officers, directors, members of the management board or supervisory board, observers or members of the investor committee or to any equivalent position in the underlying companies invested in the portfolio of the relevant Private Equity funds.

The management company may also appoint third parties of its choice to these positions. New Alpha Asset Management will report to the Investors in the annual report of the relevant financial year on all appointments made in this regard, as well as on the voting rights exercised in the general meetings of the companies in the relevant portfolio and within the supervisory boards of the aforementioned companies.

For multi-management, fund of funds strategies do not offer the opportunity to vote at General Meetings. However, for multi-management equity strategies, NewAlpha AM requests that the invested management companies have a voting policy consistent with their socially responsible investment strategies (SRI).

## Engagement Policy

New Alpha AM is in constant dialogue with asset managers throughout the investment process for multi-management. As a long-term partner, New Alpha AM takes responsibility for promoting and disseminating the best ESG practices expected by our institutional clients. This approach is even more necessary when it comes to emerging managers.

New Alpha also aims to involve partners in our goal of transitioning towards responsible and sustainable investments. The dialogue is tailored to the requirements of our clients and the profile of external asset managers, taking into account factors such as their size, investment strategy, and long-term goals. When certain ESG progress has been agreed upon and is not being met, measures can be taken on an escalating basis - decisions up to and including divestment may be made.

Although our investment strategy as a fund of funds limits our direct engagement with individual companies and voting, we are committed to actively participating in the management ecosystem. Our approach focuses on collaboration and dialogue with various stakeholders, including asset managers, professional associations, and other market participants. By interacting with these actors, we aim to promote sustainable practices, influence market standards, and encourage responsible investment behavior across the broader financial landscape.

New Alpha's direct investment team for private equity is committed to raising awareness among the managers of the companies in which the funds are minority shareholders, in order to promote best ESG practices. The teams work with partners to structure the companies' ESG approach, facilitate the sharing of experiences among different portfolio companies, vote in favor of improving ESG practices, and, in the event of confirmed significant controversy, commit to being proactive and transparent towards the LPs.

The venture capital management team also participates in the oversight bodies of most portfolio companies, in accordance with the provisions of the applicable shareholders' agreements. They play an active and ongoing role in the governance of these companies, using their business and sector expertise to promote the interests of the Fund's investors and the interests of the relevant company.