capital trust

Stewardship Policy

RNM CAPITAL FME IFSC LLP

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STEWARDSHIP POLICY

1. Introduction

RNM CAPITAL IFSC FME LLP (“the Firm”) acts as the Fund Management Entity (“FME”) for RNM Capital Trust, a Category III Alternative Investment Fund (AIF) registered with the International Financial Services Centres Authority (IFSCA).

This Stewardship Policy has been formulated in accordance with the **IFSCA Circular – Framework on Stewardship Code in IFSC (dated October 23, 2025)**.

The Policy outlines the principles and practices adopted by the Firm to responsibly discharge its stewardship responsibilities as an institutional investor, in the interest of its investors and stakeholders.

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2. Objective

The Policy seeks to:

- Promote good governance, transparency, and long-term value creation in investee companies.
- Encourage responsible engagement and informed decision-making.
- Align the Firm’s investment practices with the principles of ethical and sustainable investing.

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3. Scope and Applicability

This Policy applies to all investments made by RNM CAPITAL IFSC FME LLP on behalf of its managed funds, including RNM Capital Trust.

It covers stewardship responsibilities across monitoring, engagement, voting, conflict management, collaboration, and reporting.

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4. Governance and Oversight

The **Compliance Officer as appointed from time to time** shall be responsible for overseeing the implementation and periodic review of this Stewardship Policy.

The **Investment Committee** will support monitoring and ensure adherence to the stewardship principles.

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5. Principles of Stewardship

Principle 1 – Stewardship Policy and Disclosures

The Firm maintains this publicly available Stewardship Policy and reviews it periodically to ensure continued relevance. Employees involved in stewardship activities receive periodic training to maintain regulatory and governance standards.

Principle 2 – Monitoring of Investee Companies

The Firm actively monitors investee companies on parameters such as financial performance, governance practices, strategy, ESG conduct, and risk management.

Engagement with investee companies may include meetings with management, written communication, or participation in shareholder discussions.

Principle 3 – Intervention and Escalation

Where concerns arise regarding governance, performance, or material risks, the Firm may initiate engagement and, if necessary, escalate matters through formal communication, collaborative engagement with other investors, or voting actions. All such actions are recorded for internal review.

Principle 4 – Managing Conflicts of Interest

RNM CAPITAL FME IFSC LLP maintains a Conflict of Interest Policy to identify, manage, and, where unavoidable, disclose potential conflicts.

Any material conflict will be transparently disclosed to investors and appropriately managed in the best interest of fund beneficiaries.

Principle 5 – Voting Policy

The Firm exercises its voting rights responsibly and in alignment with investor interests and fund objectives. Voting decisions are made based on independent analysis and guided by principles of fairness, transparency, and long-term value creation. Records of voting decisions are maintained and disclosed as part of periodic reporting.

Principle 6 – Collaboration with Other Investors

The Firm may, where appropriate, collaborate with other institutional investors to promote better corporate governance and stewardship outcomes, while ensuring all such collaborations remain transparent, lawful, and non-confrontational.

Principle 7 – Disclosure and Reporting

The Firm will publish an **annual stewardship report** summarizing activities undertaken under this Policy, including engagement and voting actions.

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6. Reporting and Review Framework

- **Periodic Reporting:** Annual stewardship activity summary will be published on the Firm's website and shared with investors.
- **Internal Review:** The Investment Committee shall review adherence to this Policy at least annually and recommend any updates to ensure ongoing relevance.
- **Regulatory Reporting:** Any material deviation or significant stewardship activity shall be reported to the IFSCA as per applicable requirements.

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7. Effective Date

This Policy shall be effective from **October 24, 2025**. The Policy was reviewed and updated on **April 10, 2026.** The Policy will be reviewed periodically or as directed by the Authority.

Approved by:
RNM CAPITAL IFSC FME LLP
Designated Partner
Raghu Marwah