

# RAM Active Investments (RAM AI) 2024 Engagement Report.

*From 1<sup>st</sup> January to 31<sup>st</sup> December 2024*

## ● Engagement

By way of principle, RAM AI considers the exercise of voting rights and shareholder engagement aspects in accordance with the best interest of the relevant Collective Investment Scheme ('CIS') and its investors.

Recognising the value of different forms of engagement, RAM AI prioritises collaborative engagement where possible and combines these with direct individual engagements.

- **Collective engagements:** opportunistic and aiming to push the companies for structural change and more transparency on their non-financial reporting. RAM AI will take an active role in collaborative engagement in the form of (co-)leadership. Whilst RAM AI might use such platforms for collaborative engagement, it will not outsource its engagement responsibilities to third parties.
- The **individual engagement** process is launched whenever RAM AI is aware that any invested company is object of any relevant adverse media. These individual engagements aim at clarifying a suspicious situation to make a decision about whether to add the entity to the exclusion list. As a result, the engagement may also result in excluding a company from RAM AI's investment universe.

Engagements contribute to strengthening the sustainable investment strategy carried out by the relevant CIS.

Severe and structural breaches of the United Nations Global Compact in the areas of human rights, labour, environment and anti-corruption, ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, OCDE Guidelines for Multinational Enterprises controversies lead to exclusions and not engagements.

When RAM AI detects any controversy, it shall take any of the following 3 approaches:

1. decide to exclude a company from its investment universe (in case of serious breaches to the above-mentioned conventions);
2. engage with the company and, depending on the severity of the adverse media, allowing a temporary regime so that the company takes action and improves its behaviour;
3. seeking collective engagement.

The Engagement Policy will be reviewed on a regular basis by the firm's Responsible Investment Committee.

## ● Collaborative Engagement

At RAM AI, we believe engagements can be used as effective tools to influence our investee companies' Environmental, Social and Governmental practices. These are an integral part of our Responsible Investment Policy and align with our goal to be a responsible and active investment manager. RAM AI advocates sustainable corporate practices and proper corporate governance, which is essential for long-term shareholder value creation. By engaging, we make our voices heard

at companies' management level. Given RAM AI's size, we have determined that the most powerful tool is through active membership in collaborative platforms.

### CDP Non-Disclosure Campaigns

As a CDP signatory, each year, we join this campaign and directly engage with companies to disclose environmental performance to CDP. During the 2024 Non-Disclosure campaign, a total of 1,998 companies that had never disclosed through CDP before were called on to disclose.

This marked a 26% increase in the number of companies targeted in the previous year:

- 1,329 companies targeted to disclose on climate
- 373 companies targeted to disclose on forests
- 1,029 companies targeted to disclose on water

Analysis of the results from previous non-disclosure campaigns has shown that companies are more than twice as likely to respond if they are engaged directly through the campaign. RAM AI led the engagement on the below companies, emphasising the importance of answering the CDP questionnaire on Climate, Forest and Water issues.

Requested organisation	HQ Country	Activity	Climate	Forest	Water	Success?
Laboratorios Farmaceuticos Rovi	Spain	Pharmaceuticals	Lead		Lead	
KPJ Healthcare Berhad	Malaysia	Health care facilities	Lead			
Uni-President China Holdings	China	Tea	Lead	Lead	Lead	
Alsea of Mexico	Mexico	Fast food		Lead	Lead	Yes
Mota-Engil	Portugal	Energy infrastructure construction	Lead	Lead		Yes
Royal BAM Group nv	Netherlands	Non-residential building construction			Lead	
Gamuda Berhad	Malaysia	Transportation infrastructure & other construction			Lead	Yes
IJM Corp Bhd	Malaysia	Transportation infrastructure & other construction		Lead	Lead	
Malaysia Airports Holdings	Malaysia	Infrastructure upkeep & management	Lead	Lead	Lead	
China Overseas Land & Investment	China	Real estate owners & developers		Lead		
Deutz AG	Germany	Industrial machinery	Lead		Lead	
GT Capital Holdings Inc	Philippines	Automobiles		Lead	Lead	
Far Eastern Department Store	Taiwan, China	Department stores	Lead	Lead		

Pinduoduo ADS	China	Discretionary delivery retail	Lead			
Super Retail Group	Australia	Specialist retail	Lead		Lead	
PT AKR Corporindo Tbk	Indonesia	Chemicals wholesale & distribution	Lead	Lead	Lead	
Victory Capital Holdings	United States of America	Asset managers	Lead			
Finvolution Group	China	Banks	Lead			
DoubleUGames Co Ltd	Republic of Korea	Software	Lead			
Kingsoft Corporation Ltd.	China	Software	Lead			
PT Indosat Tbk	Indonesia	Telecommunications services	Lead		Lead	
Telekom Malaysia	Malaysia	Telecommunications services			Lead	Yes
Multiplan Empreendimentos Imobiliários S.A.	Brazil	Real estate services	Lead			
AUB Group Ltd	Australia	Other financial	Lead			
Huron Consulting Group Inc	United States of America	Other professional services	Lead			
AFREECATV Co Ltd	Republic of Korea	Web-based services	Lead			
JD.com Inc	China	Web-based services		Lead		
JOYY Inc	China	Web-based services	Lead			
Momo Inc.	China	Web-based services	Lead			
My EG Services Bhd	Malaysia	Web-based services	Lead			
Norwegian Air Shuttle ASA	Norway	Passenger airlines			Lead	

### Climate Action 100+

Climate Action 100+ engagement focuses on 170 companies that are critical to the net-zero emissions transition. RAM AI continues its ongoing engagement through Climate Action 100 on key names within its portfolio. We are monitoring the progress of the engagement led by the Lead investors and participating in the preparation of the engagement for selected companies.

## ● Individual Engagement

Although RAM AI has assessed numerous controversies made public during the year, not all of them were deemed relevant for engagement. RAM AI has individually engaged with 19 companies in 2024:

Company	Hit Date	Reason for engagement following a controversy detected	Funds
<b>TotalEnergies</b>	25.11.2024	In October 2024, serious allegations surfaced regarding human rights abuses by Mozambican soldiers stationed at TotalEnergies' LNG site, including detention, torture, and sexual violence in 2021. The area was reportedly under the protection of a security force financed by the company. TotalEnergies denies prior knowledge and states it evacuated the site in April 2021. The EU is now reviewing the matter under its corporate sustainability due diligence directive, and the situation remains under regulatory scrutiny.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY  RAM (LUX) SYSTEMATIC FUNDS – GLOBAL EQUITY INCOME  RAM (LUX) TACTICAL FUNDS - FLEXIBLE FUND
<b>AstraZeneca</b>	06.11.2024	Chinese authorities are conducting an ongoing investigation into alleged insurance fraud involving fake prescriptions of AstraZeneca's cancer drug Tagrisso. 'Dozens' of senior executives, including China President Leon Wang, are reportedly implicated. The probe has widened to include multiple regulatory bodies, and the situation remains active with no resolution yet.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY  RAM (LUX) SYSTEMATIC FUNDS – GLOBAL EQUITY INCOME  RAM (LUX) TACTICAL FUNDS - FLEXIBLE FUND
<b>TotalEnergies</b>	29.08.2024	The CFTC fined TOTS TotalEnergies Trading \$48 million for attempted manipulation of EBOB-linked futures markets to benefit its derivatives positions. The company settled the charges, agreed to cease further violations, and accepted the penalty. The controversy is now resolved.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY  RAM (LUX) TACTICAL FUNDS - FLEXIBLE FUND
<b>Bank of New York Mellon (BNYM)</b>	28.08.2024	The CFTC fined Bank of New York Mellon \$5 million for repeated swap reporting failures and supervision lapses, including violations of a prior order. BNYM has settled the charges, agreed to retain an independent compliance consultant, and taken steps to improve oversight. The controversy is now resolved.	RAM (LUX) SYSTEMATIC FUNDS – GLOBAL EQUITY INCOME
<b>Globe Life</b>	12.04.2024	Globe Life traded lower pre-market following a short report by Fuzzy Panda alleging widespread insurance fraud and management inaction. The company reviewed the claims, addressed	RAM (LUX) SYSTEMATIC FUNDS – GLOBAL EQUITY INCOME

		concerns, and reaffirmed its commitment to compliance. The controversy is now resolved, and Globe Life continues normal operations.	
<b>Bytes Technology Group</b>	19.03.2024	Bytes Technology Group investigated former CEO Mr. Murphy's resignation, triggered by an FCA inquiry into 134 undisclosed personal and spousal share transactions. The board was shocked by the breach of trust and promptly launched an internal review. The company fully cooperated with regulators, reinforced its governance procedures, and has now resolved the matter. Normal operations have resumed.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY
<b>Gildan Activewear</b>	13.03.2024	Browning West, a major Gildan shareholder, filed a lawsuit against the company and its board, alleging unfair practices ahead of the May 28 annual meeting. The suit seeks to ensure a fair, transparent vote overseen by an independent party. The situation is ongoing, with Browning West actively campaigning for shareholder support.	GLOBAL MARKET NEUTRAL EQUITY - GLOBAL MARKET NEUTRAL EQUITY
<b>UnitedHealth Group</b>	12.03.2024	Following a cyberattack on Change Healthcare, U.S. officials urged UnitedHealth Group to expedite financial support to impacted healthcare providers. The government called for transparent communication, interim payments, and reduced administrative burdens. The situation remains active, with ongoing efforts to stabilise provider cash flow.	GLOBAL MARKET NEUTRAL EQUITY - GLOBAL MARKET NEUTRAL EQUITY
<b>Vifor Pharma</b>	01.02.2024	The UK's CMA launched an investigation into Vifor Pharma over suspected anti-competitive conduct, alleging it misled about the safety of rival iron treatment Monofer to promote its own product, Ferinject. The case focuses on potential market distortion through disparagement. The investigation is ongoing, with no conclusion reached yet.	RAM (LUX) SYSTEMATIC FUNDS – EMERGING MARKET EQUITIES
<b>EchoStar Corp</b>	23.01.2024	Buxton Hemsley publicly challenged EchoStar's transaction with DISH, alleging it amounted to 'fraudulent conveyances.' The firm released past correspondence and a formal letter to EchoStar's board. The dispute has since been resolved following the disclosure and resolution of concerns.	GLOBAL MARKET NEUTRAL EQUITY - GLOBAL MARKET NEUTRAL EQUITY
<b>Sompo Holdings</b>	17.01.2024	The FSA investigated Sompo Japan over fraudulent insurance claims involving Bigmotor and determined that internal controls and compliance systems were insufficient. A business improvement order was issued to strengthen governance. The controversy is now resolved following the FSA's intervention and the company's corrective measures.	GLOBAL MARKET NEUTRAL EQUITY - GLOBAL MARKET NEUTRAL EQUITY
<b>Engie</b>	20.12.2023	In April 2023, a complaint was filed with the Dutch National Contact Point (NCP) against multiple companies, including Engie, RWE, and Glencore's Prodeco, over alleged violations of OECD guidelines linked to forced displacement in César, Colombia. The complaint alleges that mining firms benefit from paramilitary violence and that energy companies fail to conduct adequate due diligence. The case is assessed as severe and remains under review, with no resolution yet.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY  RAM (LUX) TACTICAL FUNDS - FLEXIBLE FUND

<b>Humana</b>	15.12.2023	On December 14, CMS issued a letter urging payers and pharmacy benefit managers to strengthen compliance with federal law, citing rising consumer complaints about access to vaccines, contraceptives, and the effects of prior authorisation. The move follows increased scrutiny of AI tools in care decisions and lawsuits against insurers like Humana. The situation is ongoing, with regulators pushing for greater oversight.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY
<b>Illumina</b>	18.10.2023	Carl Icahn has filed a lawsuit in the Delaware Court of Chancery against current and former Illumina directors, alleging they acted irresponsibly by closing the Grail acquisition without regulatory approval. He claims this decision exposed the company to significant financial risk and losses. The legal dispute is ongoing, with no resolution yet.	RAM (LUX) TACTICAL FUNDS - NEXT GEN TMF* 2028
<b>Deutsche Post AG</b>	20.07.2023	Germany's Federal Cartel Office has launched proceedings against Deutsche Post InHaus Services, Postcon, and Compador over suspected anti-competitive agreements in business letter consolidation services. The investigation aims to determine whether the companies coordinated to restrict competition. The case is ongoing, with no conclusions reached yet.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY
<b>Hexagon AB</b>	19.07.2023	The situation involving Hexagon AB raised serious governance concerns, including centralised control under majority owner Melker Schörling, potential insider trading by former CEO Ola Rollén, and fraud allegations by Viceroy Research. These issues pointed to a lack of checks and balances and possible conflicts of interest. However, based on the latest available information, the matter has now been resolved.	RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN EQUITIES  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY
<b>Barclays</b>	28.04.2023	Barclays was under investigation by the UK's Financial Conduct Authority (FCA) for potential failings in its anti-money laundering (AML) and know-your-customer (KYC) controls, particularly concerning high-risk clients 1. The FCA had mandated an independent review of Barclays' systems in 2024. While the investigation highlighted serious compliance concerns, the matter has since been addressed, and the situation is now considered resolved.	RAM (LUX) SYSTEMATIC FUNDS – GLOBAL EQUITY INCOME  RAM (LUX) SYSTEMATIC FUNDS – EUROPEAN MARKET NEUTRAL EQUITY

## Important Information.

**Important note:** please note that some sub-funds are not registered in some countries, please ensure the relevant sub-fund is available in your country. This document has been drawn up **for information purposes only**.

It is neither an offer nor an invitation to buy or sell the investment products mentioned herein and may not be interpreted as investment advice. It is not intended to be distributed, published or used in a jurisdiction where such distribution, publication or use is forbidden, and is not intended for any person or entity to whom or to which it would be illegal to address such a document. In particular, the investment products are not offered for sale in the United States or its territories and possessions, nor to any US person (citizens or residents of the United States of America).

The opinions expressed herein do not take into account each customer's individual situation, objectives or needs. Customers should form their own opinion about any security or financial product mentioned in this document. Prior to any transaction, customers should check whether it is suited to their personal situation, and analyse the specific risks incurred, especially financial, legal and tax risks, and consult professional advisers if necessary. The information and analyses contained in this document are based on sources deemed to be reliable. However, RAM Active Investments SA cannot guarantee that said information and analyses are up-to-date, accurate or exhaustive, and accepts no liability for any loss or damage that may result from their use. All information and assessments are subject to change without notice. Subscriptions will be accepted only if they are made on the basis of the most recent prospectus, Key information document (KID) and the latest annual or half-year reports for the financial product.

The prospectus, constitutive documents and financial reports are available in English and French while KIDs are available in the relevant local languages. These documents can be obtained, free of charge, from the SICAVs' and Management Company's head office and [www.ram-ai.com](http://www.ram-ai.com), its representative and distributor in Switzerland, RAM Active Investments S.A. and the relevant local representatives in the distribution countries.

Issued in Switzerland by RAM Active Investments S.A. which is authorised and regulated in Switzerland by the Swiss Financial Market Supervisory Authority (FINMA). Issued in the European Union and the EEA by Mediobanca Management Company S.A., 2 boulevard de la foire 1528, Grand-Duché de Luxembourg.