

**ELARA CAPITAL PLC**  
**UK STEWARDSHIP CODE DISCLOSURE STATEMENT**

**May 2018**

The FCA's Conduct of Business Sourcebook rule 2.2.3R, requires Elara Capital Plc, as a firm with permission to act as a discretionary investment manager, to include a disclosure on its website stating the nature of its commitment to the UK Stewardship Code ("the Code") issued by the Financial Reporting Council. If the firm does not commit to the Code, it must state in general terms its alternative investment strategy. The code sets out various principles relating to the level of engagement by investors with UK equity investors.

The FRC recognises that not all parts of the Code will be relevant to all institutional investors and that smaller institutions may judge some of the principles and guidance to be disproportionate. It is of course legitimate for some asset managers not to engage with companies, depending on their investment strategy, and in such cases firms are required to explain why it is not appropriate to comply with a particular principle.

**ELARA CAPITAL PLC'S STEWARDSHIP CODE DISCLOSURE:**

At present, the firm does not currently have any assets under management, nor any discretionary mandates to do so. The firm currently acts purely as a brokerage firm, sourcing and executing deals on behalf of clients, both on a matched principal and principal basis.

Although the firm supports the objectives set out within the Code, the provisions are not deemed to be relevant to the trading currently undertaken by the firm. Should any material changes occur to the business model that the firm currently operates which would make the Code relevant, the firm will consider any necessary amendments to its approach and in turn, this disclosure.

Therefore, while the firm recognises and supports the objectives set out within the Code, due to the current nature of its business model, it does not believe it appropriate or proportionate to comply with the Code's Principles.