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Shareholder Rights Directive

EATON VANCE ADVISERS INTERNATIONAL LTD ("the Firm")

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, the Eaton Vance Advisers International Ltd. (the "Firm") is required to disclose whether it conforms to the requirements of the UK Financial Reporting Council's Stewardship Code (the Code). The Code is a voluntary code and sets out a number of principles relating to engagement by investors with UK equity issuers.

Additionally, the Firm is required to publicly disclose its compliance with the Article 3g of the amended EU Shareholder Rights Directive (Directive 2007/36/EC) (the "Directive"), or explain why it does not comply with the Directive. The Directive seeks to strengthen the position of shareholders through the establishment of requirements relating to the exercise of shareholder rights attached to voting shares.

The Firm pursues a number of global strategies that involve a wide variety of investment products. Investment strategies and trading decisions are based on investment themes, publically available information about a company, and market conditions. The Firm does not pursue an activist strategy. The Firm does not directly influence management decisions with companies it invests in nor does it co-ordinate voting strategies with other shareholders.

Therefore, whilst the Firm generally supports the objectives that underlie the Code and the Directive, it has determined that compliance with both the Code and the Directive are not relevant because of the investment strategies it employs on behalf of its clients.

Eaton Vance							■ 8
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The value of your investment can go up or down so you may get back less than your initial investment. Past performance is not a guide to future returns.

The information on this webpage is not intended for U.S. residents. To visit our U.S. website please click here.

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