ACCESS TO MEDICINE FOUNDATION

2026

Access to Medicine Collective Investor Engagement

Signatory Handbook

Convened by the Access to Medicine Foundation

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1. Foreword

The Access to Medicine Collective Investor Engagement (AMCIE) is a structured, investor-led engagement initiative convened by the Access to Medicine Foundation (the Foundation). It brings together institutional investors who share the conviction that pharmaceutical companies have both a commercial interest and a societal responsibility to expand access to their essential healthcare products in low- and middle-income countries (LMICs).

Since the first Access to Medicine Index was published in 2008, investors have played an increasingly important role in encouraging pharmaceutical companies to improve their practices on access to medicine. Today, signatories to AMCIE collectively represent assets under management in excess of USD 22 trillion.

This handbook sets out how AMCIE operates. It describes the roles available to signatories, the guiding principles that underpin engagement, and the practical and legal framework within which engagement takes place. It is designed to give both existing and prospective signatories a clear understanding of what participation entails, and to provide the transparency and structure that institutional investors require.

AMCIE is not a separate legal entity. It operates under the Access to Medicine Foundation. Engagement is led by investors in their capacity as shareholders and creditors. The Foundation serves as convener, research provider and technical adviser, but does not lead engagements or make public statements on behalf of investors.

> *This handbook is a living document and will be updated periodically. Signatories will be notified of material changes.*

2. What is AMCIE and how to participate

2.1 Overview

AMCIE is an investor-led engagement initiative focused on encouraging improved pharmaceutical company practices related to access to medicine. Engagement under AMCIE is:

- Grounded in the Access to Medicine Foundation's research and analytical outputs, including the Access to Medicine Index;
- Focused on long-term risk management and value creation; and
- Intended to complement, not replace, signatories' existing stewardship activities.

Engagement may be conducted directly by institutional investor signatories, or by engagement service providers acting under mandate from institutional investors.

AMCIE covers engagement related to companies analysed by the Access to Medicine Index as its core scope. Engagement related to the Foundation's other research programmes – such as the Antimicrobial Resistance Programme, the Generic & Biosimilar Medicines Programme, the Diabetes Care Programme and the Medical Oxygen Programme – is available on an opt-in basis by contacting the investor engagement team. Signatories are not required to participate in engagement beyond the Index and may choose which additional programmes, if any, align with their mandates and stewardship priorities.

2.2 The Investor Statement

All signatories to AMCIE endorse the Investor Statement on the Access to Medicine Index, which is available at accesstomedicinefoundation.org/for-investors. The full text of the Investor Statement is reproduced below.

Investor Statement – Access to Medicine Index

The goal of investors is to create long-term shareholder value in the companies in which they invest. This potential is maximized by investing in well-managed, high quality companies, where the management team have considered fully the range of business risks and opportunities facing their companies, and taken appropriate action to manage these.

Alongside assessment of traditional financial risks and opportunities, there is growing recognition among the investment community of the potential for environmental, social and governance (ESG) factors to impact the financial performance of companies. As such, investors are also seeking for companies to demonstrate effective management of ESG factors.

We believe the issue of access to medicine in developing countries can present potentially significant business impacts for global companies in the pharmaceutical sector. As greater emphasis is placed on accessing new markets as a source for future industry growth, pharmaceutical companies are brought into ever closer contact with access to medicine issues in developing countries. Mismanagement of these issues can impact negatively on political relationships and corporate brands and encumber market access. On the other hand, if pharmaceutical companies act responsibly and with foresight, commercial potential can be unlocked.

As investors, we seek assurances that the management of the companies in which we invest have fully considered the risks and opportunities of this issue, and have effective policies and processes for dealing with the challenges. By taking management of this issue into account, alongside other key ESG and financial issues, the investment community can better assess the long-term investment value of such companies.

We are increasingly reviewing corporate approaches to access to medicine and associated aspects of intellectual property as a key strategic consideration in our analysis of the sector, where this is appropriate to do so. It is in this context that the investors listed below welcome the development of analytical tools such as the Access to Medicine Index, which may be used by investors to assess companies' management of the issue, based on information obtained from their reporting activities. By our explicit inclusion in this statement, we are agreed on the following:

- We believe the issue of access to medicine is potentially material to long-term shareholder value creation, and is a potentially relevant consideration when forming views on the strategic positioning of companies in the pharmaceutical sector. We welcome the Access to Medicine Foundation's efforts to develop a credible, transparent and independent tool, which could be useful with regards to specific issue;
- We consider that pharmaceutical companies have an important role to play in addressing the access to medicine issue;
- We will review and take into account the analysis generated from the Index as appropriate in the ESG analysis we conduct on the companies we invest in;
- We hope that the Index will contribute towards creating greater awareness within the industry of this important issue, and act as a tool for highlighting leadership and good practice, as well as gaps and challenges;
- We will provide investor input into the evolution of the Index to ensure it considers the investment perspective as appropriate and remains dynamic and relevant to the debate.

We would encourage other investors to join us in this statement.

2.3 Ways to get involved

AMCIE recognises three engagement roles, reflecting different levels of participation and responsibility. All investment firms that endorse the Investor Statement and join AMCIE are signatories. Some signatories choose to take on additional engagement responsibilities as Lead Investors or Support Investors.

All signatories benefit from:

- Access to investor briefings and company-specific research updates;
- Quarterly investor roundtables;
- Periodic consolidated engagement outcomes across companies and programmes;
- Investor events and opportunities for knowledge-sharing; and
- Support with ad hoc queries related to stewardship and voting practices.

2.4 Engagement roles

LEAD INVESTORS

Lead Investors are signatories that take primary responsibility for coordinating engagement activity with specific pharmaceutical companies across the Foundation's research programmes. For each pharmaceutical company, there are typically one to four institutional investment firms designated as Lead Investors.

Lead Investors are expected to:

- Take primary responsibility for coordinating engagement activity, including initiating and maintaining dialogue with companies during a programme cycle;
- Secure engagement meetings, with at least one engagement meeting per calendar year;
- Participate in company-specific briefings organised by the Foundation's investor engagement team;
- Stay up to date with the Foundation's research relevant to the companies they lead engagements for;
- Structure engagement discussions and priorities, drawing on the Foundation's research, benchmarks and analytical outputs;
- Maintain continuity in engagement participants where possible;
- Document engagement discussions, including meeting notes or summaries; and
- Share engagement outcomes with the Foundation's investor engagement team.

The investor engagement team consolidates engagement outcomes received from Lead Investors across companies and shares periodic engagement outcomes with all signatories. This supports learning across AMCIE and enables signatories to stay informed of engagement progress.

> *Lead Investors may also indicate their interest in participating in the Expert Review Committee that is tasked with research methodology review.*

SUPPORT INVESTORS

Support Investors are signatories that provide resources, input and reinforce messages through bilateral engagements, but do not take primary responsibility for coordinating engagement activity. This role is intended for investors that:

- Have exposure to one or more pharmaceutical companies covered by AMCIE;
- Have an interest in engagement developments and insights related to those companies;
- Have relevant expertise and capacity to support engagement preparation; and
- May not be best placed, given constraints such as holding size, differences in time-zones, or language barriers, to act as a Lead Investor for a specific company.

In practice, Support Investors are expected to:

- Stay up to date with the Foundation's research relevant to the companies they support, including attending company-specific investor briefings where possible;
- Provide input to Lead Investors with company analysis and assessment, helping to inform engagement priorities; and
- Provide input or reinforcement for engagement undertakings where appropriate, such as contributing to draft letters, annual general meeting statements or aligned follow-up communications.

The Support Investor role is intentionally flexible. Support Investors are not expected to coordinate engagement strategy, act as the primary point of contact with companies, participate routinely in engagement meetings or commit to a fixed level of participation over time.

SIGNATORIES

All investment firms that endorse the Investor Statement and join AMCIE are signatories. Some signatories choose to take on additional engagement responsibilities as Lead Investors or Support Investors, while others participate as signatories only.

Investment firms participating as signatories endorse the objectives of the Investor Statement and:

- Have limited capacity for coordinated engagement; or
- Prefer to engage companies independently.

This role reflects differences in engagement approach and capacity, rather than a difference in commitment. Signatories who are not able to actively contribute can remain signatory investors without any commitments or active role beyond endorsing the Investor Statement.

Signatories may:

- Integrate insights from the Access to Medicine Foundation's research and benchmarks into internal investment or stewardship processes; and
- Engage companies independently using the Foundation's research.

All signatories receive periodic engagement outcomes prepared by the Foundation's investor engagement team, providing an overview of engagement progress across companies and programmes.

SUMMARY OF ENGAGEMENT ROLES

Feature	Lead Investors	Support Investors	Signatories
Coordinate engagement activity	✔	✖	✖
Provide background research and engagement meeting input	✔	✔	✖
Attend collective engagement meetings	✔	✖	✖
Engage companies independently	✔	✔	✔
Public disclosure of role required by AMCIE	No	No	No
Typical time commitment	High	Medium	Low

Note: Public disclosure refers to disclosure initiated or required by AMCIE. Investors remain free to disclose their own stewardship and engagement activities in line with their internal policies.

2.5 How Lead Investors are allocated

The Foundation allocates Lead Investors for each company based on a structured assessment of the following factors:

Existing exposure and interest

The Foundation considers whether the investor holds the company in its portfolio and the holding size. Investors with established expertise in the healthcare or pharmaceutical sector, and those with a track record of supporting improved access to medicine, are well positioned for lead roles, although this is not a requirement. A long-term investment horizon, with an emphasis on sustainable value creation rather than short-term returns, is preferred.

Influence and credibility

Investors with significant assets under management may carry greater weight in influencing company behaviour. The Foundation also considers whether the investor is recognised as an influential voice in responsible investment and stewardship, or healthcare.

Capacity, resources and geographic alignment

The Foundation assesses whether the investor has dedicated stewardship or engagement staff to lead effectively, and takes into account the number of companies already assigned to avoid overburdening any single institution. Geographic proximity to company headquarters – including time zone compatibility – is considered where relevant, as is the depth of the investor's understanding of local market and regulatory conditions.

Long-term commitment

Access to medicine is a multi-year issue. Lead Investors are encouraged to commit beyond a single engagement cycle. The Foundation considers turnover risk and the likelihood of maintaining consistency in lead personnel over the engagement period.

Performance in previous engagement rounds

The Foundation takes into account an investor's track record in prior lead roles, including follow-through on engagement commitments, quality and timeliness of meeting documentation, and overall participation.

2.6 How to join AMCIE

Investment firms wishing to join AMCIE should:

1. Contact the Foundation's investor engagement team to express interest;
2. Review this handbook and the Investor Statement;
3. Indicate their preferred engagement role and any company or programme interests; and
4. Complete the sign-on form, after which the firm will be publicly listed as a signatory on the Investor Statement.

For enquiries, please contact the investor engagement team at collective.investors@accesstomedicinefoundation.org

2.7 Conflicts of interest

It is the responsibility of signatories to ensure that there are no conflicts of interest when participating in engagement with any given company. Should any conflicts of interest arise – either real or perceived – the signatory should promptly disclose these to the other investors in the engagement group and the Foundation's investor engagement team.

2.8 Moving between roles, delisting and leaving

Engagement roles within AMCIE are not fixed. Signatories may:

- Transition from Signatory to Support Investor or Lead Investor as exposure or capacity increases;
- Adjust their level of participation over time; or
- Step back from an active role while remaining a signatory.

Where possible, continuity of roles within a programme cycle is encouraged, as the Foundation recognises the value of long-term engagement in supporting effective dialogue with companies.

Signatories may withdraw from AMCIE at any time by notifying the Foundation's investor engagement team. The firm will be removed from public lists. Signatories who have taken on a Lead or Support Investor role are asked to provide reasonable notice to enable a smooth transition.

3. Guiding principles for investor engagement on access to medicine

The following principles underpin all engagement activity conducted under AMCIE. They are designed to ensure that engagement is credible, structured and aligned with both the financial interests of investors and the objective of improving access to essential healthcare products in LMICs.

PRINCIPLE 1: DUAL MATERIALITY

All engagement shall be grounded in a dual materiality approach, recognising both the financial materiality of access to medicine risks and opportunities to investor portfolios and the real-world impact materiality of pharmaceutical company behaviour on global health outcomes.

Unlike climate, where greenhouse gas emissions provide a single, widely accepted metric, access to medicine is multi-dimensional. The Foundation's research methodologies – including the Access to Medicine Index – offer the most credible available framework for assessing company performance, and inform engagement priorities.

PRINCIPLE 2: RESEARCH-ANCHORED ENGAGEMENT OBJECTIVES

Engagement objectives and success criteria shall be anchored in the Access to Medicine Foundation's research methodologies, with company-specific objectives derived from identified opportunities. The Foundation's research provides independent, evidence-based assessments that enable investors to engage with specificity and credibility.

PRINCIPLE 3: INVESTOR-LED, FOUNDATION-CONVENED

Engagement shall be led by investors and conducted in their capacity as shareholders or creditors. The Access to Medicine Foundation shall serve as convener, technical adviser and research provider, but shall not lead engagements, make public statements on behalf of investors or hold signatory status equivalent to investing institutions.

There are clear opportunities for signatories to provide input on investor engagement strategy, including through:

- Feedback on engagement strategy and opportunities in quarterly investor roundtables;
- Bilteral feedback to the investor engagement team; and
- An annual signatory satisfaction survey.

PRINCIPLE 4: STRUCTURED ESCALATION WITH PRE-DEFINED TRIGGERS

Investors may consider specific escalation tools with graduated responses to insufficient company progress. Escalation signals credibility: companies respond differently when they understand that engagement is not a substitute for accountability.

All escalation steps are at the sole discretion of individual investors. AMCIE does not prescribe, direct or coordinate escalation actions. The Access to Medicine Foundation may circulate opportunities for engagement with signatories, but does not expect their involvement. Examples of escalation steps that investors may wish to consider include:

- Communicating specific concerns in writing to the company's board or senior management;
- Issuing a public statement expressing concern about a company's progress;
- Filing or co-filing a shareholder resolution on access-related matters;
- Voting against relevant management resolutions (e.g. executive remuneration, director elections) where access to medicine performance is considered inadequate; and
- Engaging proxy advisory firms to raise awareness of access to medicine as a voting consideration.

> *These examples are illustrative only. Investors retain full discretion over their stewardship and investment actions and are not bound by the actions or views of other signatories.*

PRINCIPLE 5: LEGAL COMPLIANCE

All collaborative activity shall operate within the boundaries of antitrust regulations, acting-in-concert provisions, inside information protocols and jurisdiction-specific stewardship exemptions. Signatories are responsible for consulting their own independent legal counsel if deemed necessary. See Section 8 of this handbook for further detail.

PRINCIPLE 6: PROPORTIONATE ROLE DIFFERENTIATION

Signatories shall operate within a defined role structure distinguishing Lead Investors, Support Investors and Signatories. Role assignment shall reflect signatory capacity, holdings materiality and geographic relevance. This structure is intended to optimise effectiveness while accommodating the range of stewardship approaches among institutional investors.

PRINCIPLE 7: EXPERTISE INTEGRATION

The Access to Medicine Foundation provides signatories with access to specialist expertise that is necessary for conducting engagements – for example, in the areas of global health, LMIC market context, pharmaceutical research and development and global health policy. Access to medicine engagement can often not be conducted competently by generalist stewardship teams alone; the Foundation's research and technical support address this gap.

PRINCIPLE 8: VOTING INTEGRATION AND EXECUTIVE REMUNERATION LEVERAGE

Where direct voting leverage exists – primarily through executive remuneration resolutions, director elections and shareholder resolutions – signatories are encouraged to develop voting positions that reinforce engagement objectives. These actions remain at the sole discretion of each investor.

PRINCIPLE 9: TRANSPARENT PROGRESS REPORTING WITH CONTRIBUTION ATTRIBUTION

AMCIE shall share annual engagement outcomes with signatories that transparently assess company responses against engagement objectives, acknowledge the limitations of attribution (distinguishing investor contribution from company initiative and other factors), and evaluate initiative effectiveness against its own commitments.

Investors who are not able to actively contribute to engagement activities can participate as signatory investors without any commitments or active role. This ensures that the initiative maintains breadth of signatory support while concentrating operational responsibility among those with the capacity and willingness to engage actively.

PRINCIPLE 10: ADAPTIVE ENGAGEMENT STRATEGY

Engagement strategy shall be reviewed before each Access to Medicine Index publication, with Lead Investors required to provide feedback on whether they believe the existing engagement objectives remain appropriate and where opportunity prioritisation should be updated.

4. Engagement approaches

4.1 Engagement cycle

The following steps illustrate how engagement may typically proceed. This is not a prescriptive sequence; signatories should adapt their approach based on the company, context and their own stewardship framework.

01 Preparation and research review

Investors review the Foundation's research outputs, including Index findings, company-specific opportunities and any other relevant programme research. The Foundation's investor engagement team provides company-specific briefings open to all signatories.

02 Company dialogue

Lead Investors initiate or continue dialogue with the company. Engagement should take place at senior management level where appropriate. Investors may write to the company or hold a meeting to set out expectations.

03 Progress review

Investors review the company's response and assess whether progress is sufficient relative to expectations and the Foundation's research findings.

04 Escalation consideration

If progress falls short of expectations after extensive engagement, investors may determine whether escalation is appropriate (see Principle 4 and Section 4.2 below).

05 Outcome documentation and sharing

Lead Investors share engagement outcomes with the Foundation's investor engagement team, which consolidates and distributes periodic outcomes to all signatories.

4.2 Escalation

Escalation is a deliberate, graduated process, not an ad hoc reaction. Signatories may wish to consider escalation when a company's response consistently falls short of expectations set during engagement. The illustrative escalation steps described under Principle 4 above provide a reference framework.

It is important to note that AMCIE does not direct or coordinate escalation. All escalation decisions remain at the sole discretion of individual investors, subject to each investor's independent judgement, fiduciary duties and internal governance arrangements. The Access to Medicine Foundation may circulate opportunities for escalatory engagement steps described in Principle 4 with signatories, but does not expect their involvement.

4.3 Proxy voting

Signatories are encouraged to consider how their voting at annual general meetings can reinforce their engagement objectives. Where executive remuneration resolutions, director elections or shareholder proposals relate to issues covered by access to medicine engagement, investors may wish to develop voting positions that are consistent with the objectives they have communicated to companies.

Neither AMCIE nor the Access to Medicine Foundation prescribe how signatories should vote. Any voting decisions are taken at the sole discretion of individual investors. The Access to Medicine Foundation may provide individual institutional investors with technical expertise on voting matters.

5. Access to Medicine Foundation research programmes and company scope

The Access to Medicine Foundation is an independent non-profit organisation that seeks to transform the healthcare ecosystem by motivating and mobilising companies to expand access to their essential healthcare products in low- and middle-income countries.

The Foundation's research covers five sectors:

- Research-based pharmaceutical companies
- Generic and biosimilar medicine manufacturers
- Vaccine manufacturers
- Diagnostics companies
- Medical gas companies

The Foundation's active programmes include:

SECTOR-SPECIFIC PROGRAMMES

- Access to Medicine Index Programme
- Generic & Biosimilar Medicines Programme
- Medical Oxygen Programme

CROSS-SECTOR PROGRAMMES

- Antimicrobial Resistance Programme
- Diabetes Care Programme

The Access to Medicine Index is the primary anchor for AMCIE engagement. The Index analyses 20 large research-based pharmaceutical companies against a detailed methodology covering governance of access, research and development, and product delivery. It identifies company-specific opportunities for improvement, which form the basis of engagement objectives.
Engagement related to other programmes is available on an opt-in basis, as described in Section 2.1.

6. Governance and organisation of AMCIE

AMCIE is not itself an organisation or a legal entity. It operates as an investor engagement initiative under the Access to Medicine Foundation. Signatories at all times retain the ability to make independent investment decisions. Signatories must not share or request competitively sensitive information, inside information or commercially sensitive information.

Role of the Access to Medicine Foundation

The Foundation serves as convener and secretariat for AMCIE. In this capacity, the Foundation:

- Provides research and analytical outputs that inform engagement objectives;
- Organises investor briefings, roundtables and events;
- Consolidates and distributes engagement outcomes to signatories;
- Facilitates the allocation of Lead Investor and Support Investor roles;
- Offers technical expertise on global health, pharmaceutical research and development, regulatory frameworks and LMIC market context; and
- Maintains and publishes the signatory list and the Investor Statement.

The Foundation does not lead engagements, make public statements on behalf of investors, prescribe engagement positions, or coordinate investment or voting decisions.

Signatory input mechanisms

To ensure alignment between investor priorities and engagement strategy, AMCIE provides the following mechanisms for signatory input:

- Quarterly investor roundtables with feedback on engagement strategy and opportunities;
- Bilateral meetings with signatories; and
- An annual signatory satisfaction survey.

Independence and investor discretion

All investors participating in AMCIE act independently. AMCIE supports and informs investor-led engagement but does not prescribe engagement positions, outcomes, voting or escalation actions, or require investors to act collectively.

All engagement activities:

- Are undertaken at the sole discretion of individual investors;
- Remain subject to each investor's independent judgement, fiduciary duties and internal governance arrangements; and
- May be conducted directly by investors or through engagement service providers acting under investor mandate.

Participation in AMCIE does not constitute an agreement to acquire, hold, dispose of or vote securities, nor to coordinate investment decisions. Investors retain full discretion over their stewardship and investment actions and are not bound by the actions or views of other signatories.

7. Investor privacy and information sharing

Investor privacy and data use

The Foundation maintains a confidential database of signatory contact details for the purpose of administering AMCIE. This information is used solely for initiative communications, briefings and engagement coordination.

The Foundation requires explicit, prior permission from signatories before disclosing:

- Their Lead Investor status or focus company involvement; or
- Any engagement content shared in confidence. As the Foundation shares consolidated engagement outcomes with all signatories, any content that a signatory considers confidential must be explicitly flagged as such at the time it is shared with the Foundation's investor engagement team.

The Foundation processes personal data in compliance with the General Data Protection Regulation (GDPR) and applicable data protection legislation. For more information, please refer to our Privacy & cookie policy.

Information sharing

Information sharing within AMCIE is facilitated by the Foundation's investor engagement team and includes:

- **Periodic engagement outcomes –** The Foundation consolidates engagement outcomes from Lead Investors across companies and shares periodic updates with all signatories. These updates are confidential and available only to signatories.
- **Investor briefings –** Company-specific briefings drawing on the Foundation's research are provided to Lead and Support Investors ahead of engagement meetings, and are available to all signatories.
- **Quarterly investor roundtables –** Updates on engagement progress, research developments and opportunities for signatory input.
- **Research publications –** The Foundation publishes research that is publicly available and may be used by signatories to inform their engagement and stewardship activities.

Meeting notes and engagement documentation

Lead Investors are expected to document engagement discussions and share meeting notes or summaries with the Foundation's investor engagement team. These notes are used to inform consolidated engagement outcomes and are treated as confidential. They are not shared outside the AMCIE signatory base without the explicit consent of the Lead Investor.

8. Legal and regulatory considerations

Collective investor engagement involves coordination among multiple institutional investors in their stewardship activities with companies. This coordination raises a number of legal and regulatory considerations that signatories should understand.

Antitrust and competition law

AMCIE is a stewardship initiative, not a commercial arrangement. Signatories should not share or request competitively sensitive information, including information about pricing, trading strategies, portfolio allocations or investment intentions. Engagement discussions should remain focused on the stewardship objectives described in this handbook and the Investor Statement.

Acting in concert

Participation in AMCIE does not constitute an agreement to act in concert with respect to the acquisition, disposal or voting of securities. Signatories retain full independence in their investment and voting decisions. AMCIE does not coordinate or prescribe how investors should vote, acquire or dispose of holdings. Many jurisdictions provide specific exemptions for stewardship activities from acting-in-concert provisions, and signatories are encouraged to familiarise themselves with the rules applicable in their own jurisdictions.

Inside information

Signatories must not share inside information (as defined under applicable securities laws, including the EU Market Abuse Regulation) with other signatories, the Foundation or companies during engagement meetings. If a signatory comes into possession of inside information during the course of engagement, it should follow its own internal compliance procedures and refrain from trading on such information.

Stewardship exemptions

A number of jurisdictions have adopted stewardship codes and regulatory frameworks that expressly recognise and encourage collective engagement as a component of responsible stewardship. These include, among others, the UK Stewardship Code, the EU Shareholder Rights Directive II, the Japanese Stewardship Code and the ICGN Global Stewardship Principles. Signatories should consult the stewardship frameworks applicable in their jurisdictions and consider whether their participation in AMCIE falls within recognised stewardship exemptions.

PRI Collaboration Guidelines

Signatories are encouraged to review the PRI Collaboration Guidelines, which provide practical guidance for investors participating in collective engagement. The guidelines are available at public.unpri.org/collaborative-engagements/pri-collaboration-guidelines/13304.article.

Independent legal advice

This handbook does not constitute legal advice. Signatories are responsible for assessing whether their participation in AMCIE is consistent with their own legal and regulatory obligations and for consulting their own independent legal counsel where deemed necessary. The Access to Medicine Foundation does not provide legal advice to signatories.

> ***Disclaimer:*** *AMCIE is a stewardship initiative that supports and informs investor-led engagement. It does not prescribe engagement positions or outcomes, voting or escalation actions, or coordinate investment decisions. Any engagement, voting or investment decisions are taken at the sole discretion of individual investors, in line with their fiduciary duties and internal governance arrangements. Participation in AMCIE does not create any legal obligations beyond those described in this handbook.*

Contact

For more information about AMCIE, or to discuss joining as a signatory, please contact:

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