

Financial Reporting Council's Stewardship Code ("The Code")

The Code sets out good practice for shareholders on engagement with investee companies, and is overseen by the Financial Reporting Council (FRC).

Stewardship refers to how firms' protect and manage client investments through active monitoring of UK listed investee companies, which includes inter alia engaging with company management on strategy, performance, governance and risk management.

Its general purpose is to re-connect institutional investors to a responsibility in overseeing UK listed companies' compliance with the UK Corporate Governance Code.

The Principles

Institutional Investors should;

- Publically disclose their policy on how they will discharge their stewardship responsibilities
- Have a robust policy on managing conflicts of interest in relationship and this policy should be publically disclosed
- Monitor Investee companies
- Establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value
- Be willing to act collectively with other investors where appropriate
- Have a clear policy on voting and disclosure of voting activity
- Report periodically on their stewardship and voting activities

FCA Requirement

Under COBS 2.2.3R of the Financial Conduct Authority handbook of rules and guidance, firms' managing investments (other than venture capital firms) on behalf of professional clients (who are not individuals) are obliged to disclose:

- the nature of its commitment to the Financial Reporting Council (FRC) Stewardship Code; or
- where it does not commit to the Code, its alternative investment strategy.

Disclosure of commitment to the Financial Reporting Council's Stewardship Code ("The Code") under FCA COBS 2.2.3R.

Method Investments & Advisory Ltd ("The Firm") is an investment firm based in the United Kingdom and authorised and regulated by the Financial Conduct Authority. The Firm manages the investments of its professional clients pursuant to investment strategies agreed with those clients and it would commit to the Code only if and to the extent included in a client's investment strategy. Our approach is consistent with the Firm's overall aims, which are to provide good long-term performance to our clients, and keeping clients' interests paramount.

The Firm monitors all investee companies as part of its general investment policy and approach. The Firm takes action in line with its investment objectives where its research of publically available information warrants such action. However, given the nature of our chosen investment strategy, this approach does not include active engagement with UK listed investee companies, nor do we consider that our clients would expect such engagement.

Where we have a right to vote in relation to investee companies, we will take decisions in the best interest of our investors and their long term interests and record what decisions we have taken in this respect. We do not normally make those decisions public.

If our investment strategy changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.