

Shareholder Engagement

October 2023

**Statement in response to SRD II and the
UK Stewardship Code**

01. Introduction

The Shareholder Rights Directive II (SRD II) aims to promote better shareholder engagement and improve transparency in the ownership of companies.

The UK Stewardship Code sets high stewardship standards for asset owners and asset managers, and for service providers that support them.

This document sets out our approach to stewardship and engagement. This document applies to Investment Fund Services Limited ('IFSL'), as Authorised Fund Manager (AFM) to a number of collective investment schemes ("Funds") which are authorised and regulated by the Financial Conduct Authority ("FCA").

This includes Undertakings for the Collective Investment in Transferable Securities ("UCITS"), which comply with the conditions of the UCITS Directive, and Non-UCITS Retail Schemes ("NURS") which constitute Alternative Investment Funds under the Alternative Investment Fund Managers Regulation ("UK AIFM Regime").

IFSL is domiciled in the United Kingdom and authorised and regulated by the Financial Conduct Authority.

02. Investment management activities

Firms which carry out the investment management activities of investing and managing Funds' assets must have robust processes in place, to manage these assets in line with the Funds' investment objectives and policy. This includes being engaged with all Fund assets to ensure they continue to perform in line with expectations.

The business model of IFSL is such that all investment management activities are delegated to various authorised and regulated investment management firms, known as '**Delegates**' in this document. As a result, IFSL doesn't carry out any investment management activities on behalf of the Funds we operate and hence has chosen not to conform to the requirements set out by SRD II and The UK Stewardship Code.

Not all Delegates are in scope for SRD II or the Stewardship Code. Where Delegates are in scope, they are required to have their own processes and procedures in place to ensure compliance with the requirements or alternatively to provide an appropriate explanation as to why they have chosen not to comply.

03. Oversight of investment management activities

Although IFSL delegates the investment management activity for all its Funds to the Delegates, as AFM, we remain responsible for the activities carried out by the Delegates on behalf of our Funds.

Therefore, we have systems and controls in place to oversee IFSL's Funds and the investment managers we appoint. This includes procedures for monitoring Delegates' approach to stewardship and engagement.

04. Delegates' systems and controls

The following list of topics are the areas that IFSL expect to review when monitoring Delegates' compliance.

Voting

For Funds which invest in equities, voting at Annual and Extraordinary General Meetings (AGMs and EGMs) provides an opportunity for engagement with companies.

Voting decisions are made by Delegates in accordance with their individual determination of the significance of the shareholding within the Fund. Where a significant shareholding exists within a Fund, voting rights are exercised in an informed manner.

Delegates generally vote in support of company management but where appropriate, will vote against should they consider this to be in accordance with their stewardship responsibilities and the shared investment aims of investors.

Non-Voting Engagement with companies

Engagement is an opportunity for Delegates to develop their understanding of companies and to share their approach to investment with these companies to enhance their understanding of mutual objectives.

Typically, this is achieved through face-to-face meetings, telephone calls and emails, and collaboration with other industry bodies or shareholders.

Monitoring

Delegates carefully monitor chosen investments and potential investments. Companies are assessed on material issues including strategy, capital structure, financial and non-financial performance, and risk factors. Material issues are considered matters likely to affect the ability to create future value.

Managing conflicts

Conflicts of interest can and do arise. Where potential conflicts may occur or arise, Delegates act in the best interests of our Funds and investors, ahead of their own interests.

Reporting

In scope Delegates are responsible for producing and publishing their own engagement and voting policies and making an annual disclosure of compliance.

A list of IFSL Funds can be found in the Appendix to this document, along with details of the Delegated Investment Manager.

Appendix

The following Funds are managed by our Delegates. We have provided their websites, where available, to help you find their engagement policy and annual disclosures.

Fund Name	Delegate	Website
Acumen Income Portfolio	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
Acumen Portfolios 4, 5, 6, 7 & 8	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
IFSL AMR Diversified Portfolio	AMR Financial Management Ltd	www.amrinvest.co.uk
IFSL atomos Balanced	Atomos Investments Limited	www.atomos.co.uk
IFSL atomos Cautious	Atomos Investments Limited	www.atomos.co.uk
IFSL atomos Conservative	Atomos Investments Limited	www.atomos.co.uk
IFSL atomos Defensive	Atomos Investments Limited	www.atomos.co.uk
IFSL atomos Growth	Atomos Investments Limited	www.atomos.co.uk
IFSL Avellemy: 3, 4, 5, 6, 7 & 8	Avellemy Limited	www.avellemy.co.uk
IFSL Avellemy European Equity	Avellemy Limited	www.avellemy.co.uk
IFSL Avellemy UK Equity	Avellemy Limited	www.avellemy.co.uk
IFSL Avellemy UK Equity Income	Avellemy Limited	www.avellemy.co.uk
IFSL Avellemy US Equity	Avellemy Limited	www.avellemy.co.uk
IFSL Bowland	Canaccord Genuity Wealth Limited	www.canaccordgenuity.com
IFSL CAF ESG Cautious	abrdn Investment Management Limited	www.abrdn.com
IFSL CAF ESG Growth	abrdn Investment Management Limited	www.abrdn.com
IFSL CAF ESG Income and Growth	abrdn Investment Management Limited	www.abrdn.com

Fund Name	Delegate	Website
IFSL Church House Balanced Equity Income	Church House Investments Limited	www.ch-investments.co.uk
IFSL Church House Esk Global Equity	Church House Investments Limited	www.ch-investments.co.uk
IFSL Church House Investment Grade Fixed Interest	Church House Investments Limited	www.ch-investments.co.uk
IFSL Church House Tenax Absolute Return Strategies	Church House Investments Limited	www.ch-investments.co.uk
IFSL Church House UK Equity Growth	Church House Investments Limited	www.ch-investments.co.uk
IFSL Church House UK Smaller Companies	Church House Investments Limited	www.ch-investments.co.uk
IFSL CPN Defensive Strategy	CPN Investment Management LLP	www.cpngroup.co.uk
IFSL CPN Global Opportunities	CPN Investment Management LLP	www.cpngroup.co.uk
IFSL Equilibrium Adventurous Portfolio	Equilibrium Investment Management LLP	www.equilibrium.co.uk
IFSL Equilibrium Balanced Portfolio	Equilibrium Investment Management LLP	www.equilibrium.co.uk
IFSL Equilibrium Cautious Portfolio	Equilibrium Investment Management LLP	www.equilibrium.co.uk
IFSL Equilibrium Defensive Portfolio	Equilibrium Investment Management LLP	www.equilibrium.co.uk
IFSL Equilibrium Global Equity Portfolio	Equilibrium Investment Management LLP	www.equilibrium.co.uk
IFSL Hathaway	Hathaway Investment Management Limited	www.hathawayinvestment.com
IFSL James Hambro Barnham Broom	James Hambro & Partners LLP	www.jameshambro.com
IFSL James Hambro Master	James Hambro & Partners LLP	www.jameshambro.com
IFSL James Hambro Penrhos	James Hambro & Partners LLP	www.jameshambro.com
IFSL James Hambro Rires	James Hambro & Partners LLP	www.jameshambro.com

Fund Name	Delegate	Website
IFSL Marlborough Balanced	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Bond Income	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Cautious	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Conservative	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough European Special Situations	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Extra Income	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Far East Growth	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Global	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Global Bond	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Global Essential Infrastructure	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Global Innovation	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Global SmallCap	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough High Yield Fixed Interest	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Multi-Cap Growth	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Multi Cap Income	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Nano-Cap Growth	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough Special Situations	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough UK Micro-Cap Growth	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Marlborough US Multi-Cap Income	Marlborough Investment Management Limited	www.marlboroughfunds.com
IFSL Ravenscroft Balanced	Ravenscroft (CI) Limited	www.ravenscroftgroup.com
IFSL Ravenscroft Diverse Income	Ravenscroft (CI) Limited	www.ravenscroftgroup.com
IFSL Ravenscroft Global Blue Chip	Ravenscroft (CI) Limited	www.ravenscroftgroup.com
IFSL Ravenscroft Growth	Ravenscroft (CI) Limited	www.ravenscroftgroup.com

Fund Name	Delegate	Website
IFSL Meon Adaptive Growth	RC Brown Investment Management PLC	www.rcbim.co.uk
IFSL RC Brown UK Primary Opportunities	RC Brown Investment Management PLC	www.rcbim.co.uk
IFSL Rockhold Fixed Interest	Rockhold Asset Management Limited	www.rockholdam.co.uk
IFSL Rockhold Global Equity	Rockhold Asset Management Limited	www.rockholdam.co.uk
IFSL Signia Balanced	Arbion Limited	www.arbion.com
IFSL Signia Conservative	Arbion Limited	www.arbion.com
IFSL Signia Growth	Arbion Limited	www.arbion.com
IFSL Signia Sovereign	Arbion Limited	www.arbion.com
IFSL Titan Equity Growth	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
IFSL Trade Union Unit Trust	abrdn Investments Limited	www.abrdn.com
IFSL YOU Adventurous	YOU Asset Management Limited	www.you-asset.co.uk
IFSL YOU Multi-Asset Blend Balanced	YOU Asset Management Limited	www.you-asset.co.uk
IFSL YOU Multi-Asset Blend Cautious	YOU Asset Management Limited	www.you-asset.co.uk
IFSL YOU Multi-Asset Blend Growth	YOU Asset Management Limited	www.you-asset.co.uk
Mazarin Adventurous	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
Mazarin Cautious	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
Mazarin Balanced	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com
Mazarin Cautious	Titan Investment Solutions Limited	www.titaninvestmentsolutions.com