

We have outlined this policy so as to describe our approach to shareholder engagement as required under the Directive (EU) 2017/828 and UK legislation deriving therefrom. Activus Wealth Limited (AWL) mainly invests client money into collective investment schemes or investment companies and this engagement policy is formulated on that basis.

Engagement and the Investment Process

AWL recognises that as part of the investment process it is necessary to consider its engagement with investee companies whether indirectly through the investee scheme or where appropriate by AWL directly. AWL therefore monitors and engages with prospective investee companies (to the extent appropriate to the size and type of the proposed holding) before an investment in these companies is made. The monitoring will be conducted through meetings/presentations with managers of investee companies. We will also monitor the RNS and media reporting as well as through communications with brokers. This engagement enables AWL to understand the business better, to be able to monitor the investments on an ongoing basis, and, where appropriate, to monitor companies' adherence to their stated policies on the management of various issues including environmental, social and governance (ESG) factors.

Ongoing Monitoring and Stewardship of Investee Companies

To the extent appropriate, AWL engages with the management of funds and investment companies on a regular. AWL may challenge management on aspects of their business, financial and non-financial performance or risk, allocation of capital and monitoring of ESG issues. AWL will monitor ESG issues through engagement with clients and investors, following developments and stories in the media, engaging with brokers and attending relevant presentations and webinars.

AWL will seek to raise any relevant concerns with management where it believes that to be in the interest of investors. AWL looks to maximise the value of the investments it has made over both the long term and the short term, and looks to meet its stewardship responsibilities by participating in shareholder votes and actively engaging with company management where it considers that this furthers the aim of maximising value to clients.

Cooperation With Other Shareholders or Collective Engagement

Where investments are made in collective investment schemes or investment companies AWL recognises that the fund manager may cooperate with other shareholders when engaging with companies and other issuers in a form of collective engagement. AWL does not presently carry out such collective engagement but it may undertake such collective engagement in the future.

Voting Rights

AWL will consider on a case by case basis, having in mind the long and short term interests of its clients, whether and how it should exercise voting rights in respect of holdings unless the holder expressly requests a particular action or inaction. In these instances voting is instructed via the relevant platform provider where possible.

Conflicts of interest

AWL maintains a policy which sets out how it manages actual and potential conflicts of interest arising from or affecting its business activities. This can be accessed on request.

Annual Disclosure

AWL is required to provide an annual disclosure of its shareholder engagement activities, which will be made available on the Activus website