

# Stewardship and Engagement

At Architas we are committed to acting as responsible investors on your behalf. The policy below (which you can view) has been produced on the basis of describing Architas' approach to the Financial Reporting Council's Stewardship Code, both for the funds we manage directly and for the funds that we delegate to others to manage on our behalf.

## **Voting Policy (incorporating UK Stewardship Code)**

From 10 June 2019, under the recast Shareholders Rights Directive, asset managers such as Architas are also required either to publish an Engagement Policy and information about how we comply with it, or to explain why not.

The engagement policy must describe how the firm:

- (1) integrates shareholder engagement in its investment strategy;
- (2) monitors investee companies on relevant matters, including:
  - (a) strategy;
  - (b) financial and non-financial performance and risk;
  - (c) capital structure; and
  - (d) social and environmental impact and corporate governance;
- (3) conducts dialogues with investee companies;
- (4) exercises voting rights and other rights attached to shares;
- (5) cooperates with other shareholders;
- (6) communicates with relevant stakeholders of the investee companies; and
- (7) manages actual and potential conflicts of interests in relation to the firm's engagement

We have decided not to publish an Engagement Policy at this moment.

As a 'Multi-Manager' firm, apart from investment funds constituted as corporations, Architas does invest directly in company shares. In the absence of clear regulatory guidance or market practice on how the Engagement Policy requirement should apply to multi-managers, we have decided to continue to rely on our existing Voting and Stewardship Code, which works towards the same ends, but is based on individual guidance from the UK Financial Reporting Council on how multi-managers should promote stewardship and engagement.

We will keep this decision under review and may publish an Engagement Policy at a later date if we deem that this will add value for our clients.