

## **Engagement policy**

We are required, when providing discretionary services, to set out a detailed engagement policy or explain why we have chosen not to produce an engagement policy.

An engagement policy sets out how firms monitor and communicate with the companies in which they invest on behalf of their clients. Our view however is that this policy is more appropriate to firms providing discretionary services to large institutional clients such as pension funds or investment funds rather than discretionary services provided to retail clients. While we do engage with investee companies, our ability to do so is limited as generally the proportion of shares held in a company is lower than those held by major institutions. We have therefore decided not to have a formal engagement policy.

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