

# Valu-Trac Investment Management Limited

Authorised and regulated by the Financial Conduct Authority (FCA), registration number 145168.  
Registered in England No. 2428648

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Orton, Moray  
IV32 7QE

## ***UK Stewardship Code***

Valu-Trac Investment Management Limited ("Valu-Trac") fully supports the principles embodied in the UK Stewardship Code 2026 ("the Code") which was introduced by, and is overseen by, the Financial Reporting Council (FRC).

### ***The Principles of the Code***

Stewardship is the responsible allocation, management and oversight of capital to create long-term sustainable value for clients and beneficiaries. To set a high standard of transparency an asset manager and service provider should

1. integrate stewardship and investment to deliver long term sustainable value for clients and beneficiaries.
2. Identify and respond to market-wide and systematic risks to promote well-functioning financial markets.
3. engage to maintain or enhance the value of assets.
4. actively exercise their rights and responsibilities.
5. integrate stewardship considerations into their selection and oversight of external managers
6. monitor and hold to account stewardship service providers.

### ***Investments Managed by Third-Party Delegated Investment Managers***

Valu-Trac recognises that the stewardship approach of its Delegated Investment Managers will vary based on the nature of the investment strategy employed, size, type and business model and will not exercise stewardship in an identical way.

January 2026

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Registered Office:

Level 4, Dashwood House, 69 Old Broad Street  
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