

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 ("the Code") which was introduced by, and is overseen by, the Financial Reporting Council.

The Principles of the Code

So as to protect and enhance the value that accrues to the ultimate beneficiary, institutional investors should

1. publicly disclose their policy on how they will discharge their stewardship responsibilities.
2. have a robust policy on managing conflicts of interest in relation to stewardship which should be publicly disclosed.
3. monitor their investee companies.
4. establish clear guidelines on when and how they will escalate their stewardship activities.
5. be willing to act collectively with other investors where appropriate.
6. have a clear policy on voting and disclosure of voting activity.
7. report periodically on their stewardship and voting activities.

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.

Registered Office:

Level 13, Broadgate Tower, 20 Primrose Street
London, EC2A 2EW