



ARBUTHNOT LATHAM

Bankers since 1833

Engagement Policy Statement 2021

Annual Disclosure of Implementation

Under the Shareholder Rights Directive II (SRD II), Arbuthnot Latham is required to publicly disclose on an annual basis how its Engagement Policy Statement has been implemented.

The terms 'we', 'our' and 'Arbuthnot Latham' in this Policy Statement refer to Arbuthnot Latham & Co., Limited and Arbuthnot Latham (Nominees) Limited.

Shareholder Engagement Approach

In the period between 11th June 2020 and 10th June 2021, Arbuthnot Latham invested, on behalf of retail clients, in shares of companies with a registered office in an EU member state and whose share are admitted to trading on an EEA regulated market (or on a comparable market outside the EEA).

We have reviewed our Engagement Policy Statement and no changes have been made to our approach regarding the integration of shareholder engagement into our investment strategy.

Disclosure of Implementation

Below is a description and explanation of our voting activity and use of proxy advisors for the first full period after the rules come into effect.

Voting Behaviour

Arbuthnot Latham cast two votes in the period that it deems significant based on the relative size of votes cast to the share float in public markets. Details of which can be found below:

Odyssean Investment Trust – 11/01/2021

We voted in favour of the Investment Policy amendment to restrict investments in unethical or unsustainable sectors. This is an industry-wide trend and should represent shareholder value without introducing undue disruption to the fund's management or performance.

Strategic Equity Capital Investment Trust – 30/03/2021

We voted in favour of continuation of the trust as we believe management are well positioned and motivated to continue to profit from the portfolio, but we continue to monitor the situation closely. In line with this we voted against reconstruction proposals.

All other votes cast in the period were deemed insignificant in accordance with their size relative to the voting population and procedural nature of the votes.

Proxy Advisors Services

Arbuthnot Latham made no use of proxy advisor services for the purpose of engagement activities.

Conflicts of Interest

Arbuthnot Latham has no conflicts of interest to disclose in connection with engagement activities.

Securities Lending

Arbuthnot Latham does not engage in securities lending.