

Shareholder Engagement Policy

Shareholder Rights Directive requirements

As Farley & Thompson is a UK Mifid investment firm and a provider of discretionary investment services, the Shareholder Rights Directive and Financial Conduct Authority rules require us to publicly disclose a detailed shareholder engagement policy or explain why we have chosen not to do so. A shareholder engagement policy is an annual disclosure and describes how a firm conducts dialogues with investee companies on matters such as strategy, financial and non-financial performance, social and environmental impacts and corporate governance. It also describes how the firm has exercised its voting rights and other rights attached to the shares under its control.

Farley & Thompson does not have a formal engagement policy. Our view is that such a 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.

Our ability to engage with listed companies is limited. Generally, the proportion of shares we hold in a company is far lower than those held by major institutions. Accordingly, we do not believe it is appropriate for our firm to have a formal shareholder engagement policy.

Disclosing shareholder information

The Shareholder Rights Directive gives the right to listed companies to identify their shareholders and requires intermediaries such as ourselves to cooperate in that identification process. As advised in our Terms & Conditions of Business and our Privacy Policy, we will provide such information only in order to comply with our legal and regulatory obligations.