

Shareholder Rights Directive II (SRD II) Engagement Policy Annual Disclosures and General Description of voting behaviour

June 2021

Walker Crips Investment Management Limited (WCIM)'s policy on voting rights is set out in the Terms of Service and Business, which is provided to all clients.

We support our clients in exercising their right to vote in our discretionary managed assets. Where clients identify a vote where they wish to exercise their rights, they may instruct us to vote on their behalf and we will cast a vote for the shares held by them. We seek to ensure that all proxies are voted in the best interest of our clients and that proxy voting activities are carried out in accordance with all applicable rules.

WCIM does not use the services of proxy advisers.

Investment activity is regularly reported to our clients, and where it is requested by a client, we will report details of our voting activities.

We review our policy and voting activities annually, and may update this statement and any related policies to reflect any material changes. Individual client voting activities are deemed confidential and are reported to clients upon request.

Shareholdings of 3% or more of the issuer's voting rights are considered "most significant votes".

During the period 1/6/2020-10/6/2021 WCIM has not exercised voting rights for discretionary clients with shareholding of 3% and more in relation to shares traded on EEA regulated market. No SRD institutional investors have been identified during this period.

Walker Crips Investment Management

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