

UK Stewardship Code Disclosure

April 2024

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MS AMLIN INVESTMENT MANAGEMENT LIMITED (“MS AIML” or “the firm”) provides discretionary investment management services to a variety of clients, including institutional investors.

Under COBS 2.2.3R of the FCA Handbook we are required to make a public disclosure in relation to the nature of our commitment to the UK Financial Reporting Council’s Stewardship Code (“the Code”), updated in January 2020.

The Code was published by the FRC, the United Kingdom’s independent regulator responsible for promoting high quality corporate governance and reporting in order to foster investment. The Code is directed at asset owners and asset managers and sets high stewardship standards through 12 Principles which apply on a ‘comply or explain’ basis. The latest version of the Code applies to all assets which asset managers and asset owners may invest in. Unlike previous versions of the Code, its Principles also apply to assets other than listed equity, such as fixed income, real estate and infrastructure. Signatories to the Code have to consider how to exercise effective stewardship when investing across these asset classes taking into account different terms, investment periods, rights and responsibilities associated with them.

MS AIML delegates the selection of assets, including shares, to other investment managers. These third party managers are selected via a thorough a stringent due diligence process and are subject to ongoing monitoring. We determine our approach to stewardship on a case by case basis, taking into account the actions that will lead to the most favourable outcome for the value of our investments.

Whilst not being a direct signatory at present, MS AIML supports the aims of the Code and firmly believes in the importance of corporate governance driven by strong boards and executive leadership and sound governance policies that protect and enhance long term shareholder value. Where appropriate, we seek to engage effectively with our delegated investment managers to understand better the potential risks and returns in order to achieve optimum returns.

We will seek to review this statement on an annual basis, and update where necessary to reflect changes in actual practice. We will inform the FRC appropriately.

Should you require further information on the firm’s approach to the Code please contact the MS AIML Legal & Compliance Team at: MSAiml.Legal&Compliance@msamlin.com.