

The UK Stewardship Code NGAM UK Limited's Approach

NGAM UK Limited ("NGAM UK") is a Discretionary Investment Manager to Professional Clients which supports the principles of the Financial Reporting Council's UK Stewardship Code ('the Code'). NGAM UK is authorised and regulated by the UK Financial Conduct Authority and is part of NGAM International Distribution ("NGAM International"), the distribution arm of Natixis Global Asset Management. ("NGAM") headquartered in France (Paris) and USA (Boston) and uniting the expertise of specialised investment managers based in Europe, the US and Asia into a single organisation.

In addition to its distribution activities, NGAM UK is licensed by the FCA as a Discretionary Investment Manager and is, therefore, able to sign investment management agreements with institutional clients. Where that is the case, NGAM UK delegates the investment management to its affiliate investment managers ('Delegate Manager') who have their own governance, procedures and policies based on their individual registrations. NGAM UK selects a Delegate Manager bearing in mind the Professional Client's investment objectives and general requirements and maintains effective oversight of its Delegate Managers through the NGAM International Delegate Oversight Programme.

NGAM UK ensures that each Professional Client has agreed to this approach and that the Delegate Management is able to meet client expectations at the commencement of the appointment in regard to the Code.

This statement sets out NGAM UK's response to the provisions of the Code, taking into account the delegated structure of NGAM UK's investment management business.

Principle 1

Institutional investors should publicly disclose their policy on how they will discharge their stewardship responsibilities

NGAM UK Position – Fully Support

NGAM UK fully supports the principle of the Code and ensures that this statement can be accessed on its website. In addition, interested parties may be directed to Delegate Managers' own policies and procedures on the Code, Proxy Voting and Conflicts of Interest.

Principle 2

Institutional investors should have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed

NGAM UK Position – Fully Support

NGAM UK itself maintains a Conflicts of Interest policy and keeps a Conflicts Register which sets out the controls surrounding all potential conflicts that could arise as a result of its relationship with our parent, between Clients or a Delegate Manager.

NGAM UK Limited

Registered office: NGAM UK Limited, One Carter Lane, London, EC4V 5ER, United Kingdom
Company No: 3680538. Registered in England
Authorised and regulated by the Financial Conduct Authority (register no. 190258)

Principle 3

Institutional investors should monitor their investee companies

NGAM UK Position – Fully Support, comply through delegate Investment Manager

NGAM UK relies on the approaches developed by each Delegate Manager. Each Delegate Manager adopts its own investment process and proxy voting through which investee companies are first identified, assessed and monitored on an ongoing basis. NGAM UK would ensure, prior to appointing a Delegate Manager, that the Delegate Manager is committed to meeting the client's expectations in this area.

Principle 4

Institutional investors should establish clear guidelines on when and how they will escalate their stewardship activities

NGAM UK Position – Fully Support, comply through delegate Investment Manager

Our affiliates Delegate Managers each apply their own approach to escalation and shareholder engagement. They will consider intervention on a case by case basis. We will ensure that any commitment given to NGAM UK clients is met by the Delegate Manager.

Principle 5

Institutional investors should be willing to act collectively with other investors where appropriate

NGAM UK Position – Reliance on delegate Investment Manager

Our affiliate Delegate Managers will consider the steps to be taken in specific situations on a case by case basis and in accordance with their internal policies and applicable requirements. We will ensure that the Delegate Manager fulfills commitment given to clients in this area.

Principle 6

Institutional investors should have a clear policy on voting and disclosure of voting activity

NGAM UK Position – Fully Support

To the extent that a client does not retain voting rights, the responsibility for exercising voting decisions is assigned, through the delegation mandate, to the Delegate Manager appointed under the terms of the mandate. Where that is the case, the Delegate Manager's own proxy voting policy will apply.

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Principle 7

Institutional investors should report periodically on their stewardship and voting activities

NGAM UK Position – Fully Support

Each Delegate Manager considers clients' reporting requirements and caters for those needs accordingly. NGAM UK will ensure that reporting is provided to client as agreed.

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