

## UK Stewardship Code Statement for GIS

### UK Stewardship Code Statement

Under Rule 2.23R of the FCA's Conduct of Business Sourcebook, Global Insight Solutions Limited (GIS) is required to disclose its commitment to the UK Financial Reporting Council's (FRC) Stewardship Code (the "Code") or, where it does not commit to the Code, provide an explanation of its alternative investment strategy.

The Code is a voluntary framework that outlines principles of effective stewardship for asset owners and managers who invest in UK equity issuers. It is intended to promote sustainable long-term value creation for clients and beneficiaries, as well as benefits for the economy, the environment, and society.

The principles of the UK Stewardship Code include:

- **Purpose and Governance:** Alignment of purpose, investment beliefs, and strategy to support long-term value creation.
- **Resources and Conflicts of Interest:** Governance structures and management of conflicts to prioritize client interests.
- **Systemic Risk Management:** Identification and response to market-wide and systemic risks.
- **Policy Review:** Regular review of policies, processes, and outcomes.
- **Client Engagement:** Communication of stewardship activities and outcomes.
- **ESG Integration:** Systematic incorporation of environmental, social, and governance (ESG) considerations into investment decisions.
- **Issuer Accountability:** Engagement with issuers to maintain or enhance asset value.
- **Collaboration and Escalation:** Collaborative efforts and escalation of stewardship activities as necessary.
- **Exercising Rights:** Active exercise of voting rights and other ownership responsibilities.

### GIS's Position on the UK Stewardship Code

GIS supports the principles underlying the UK Stewardship Code and recognizes the importance of effective stewardship in fostering long-term value creation. However, GIS does not currently commit to the Code for the following reasons:

- GIS's investment strategies primarily focus on **smaller global companies, emerging markets, and niche opportunities**, which may not involve materially sized positions in UK-listed equity securities.
- GIS takes a **consistent and jurisdiction-agnostic approach** to engagement with issuers, ensuring alignment with the firm's investment philosophy and fiduciary duties to clients.

GIS applies stewardship practices tailored to the nature of its investments, including monitoring investee companies, integrating ESG factors, and engaging with issuers where necessary to protect and enhance the value of its investments.

This policy is subject to periodic review and may be updated if GIS's investment strategies evolve to involve greater engagement with UK-listed equity securities or if the firm determines that formal commitment to the Code would enhance its stewardship practices.

For further information on GIS's approach to stewardship, please contact **[compliance@globalinsightsol.com](mailto:compliance@globalinsightsol.com)**.

**Date Reviewed:** January 27, 2025