



STONEHAGE  
FLEMING

THE INTERNATIONAL FAMILY OFFICE

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STONEHAGE FLEMING INVESTMENT MANAGEMENT LIMITED  
UPDATED SHAREHOLDER RIGHTS DIRECTIVE (SRD II)

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OCTOBER 2019

## Updated Shareholder Rights Directive (SRD II)

The purpose of the SRD II is to promote effective stewardship and long term investment decision making across the institutional investment community.

Under the SRD II we are required to provide certain disclosures where investment is being made in shares traded on a regulated market. We must provide information to asset owners, including on how their investment strategies contribute to the medium to long term performance of the assets.

We must develop and publicly disclose, on a comply or explain basis, an Engagement Policy that meets the requirements of the SRD II and corresponding Financial Conduct Authority (FCA) rules, and disclose annually how this Policy has been implemented.

We are currently developing this Policy which will be published on our website. Where we have chosen not to comply in any way, we shall provide a clear and reasoned explanation.

The Policy will describe how we:

- integrate shareholder engagement in its investment strategy;
- monitor investee companies on relevant matters;
- conduct dialogues with investee companies;
- exercise voting rights and other rights attached to shares;
- cooperate with other shareholders; and
- communicate with relevant stakeholders of the investee companies; and
- manage actual and potential conflicts of interests in relation to the firm's engagement.

The annual disclosure will include a general description of voting behaviour, an explanation of the most significant votes and the use of the services of proxy advisors (Proxy advisors provide research, data, and recommendations on management and shareholder proposals that are voted on at Company Annual Meetings).

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