Fundhouse Limited: Stewardship Code

January 2021

The FCA requires that we publish our stewardship code on our website. According to the FCA, the seven principles of the Code are that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities;
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship;
- Monitor their investee companies;
- Establish clear guidelines on when and how they will escalate their activities;
- Be willing to act collectively with other investors where appropriate;
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities.

We are only involved in running model portfolios, which exclusively involves the investment in collective investment schemes and we do not manage investments in shares and as such this is not relevant. Equally, SRD II, also aims to promote effective stewardship, but is also focused on shares, not collective investments. Accordingly, we have not developed any policies around this. In our view we are not expected to make any disclosures about this either.