

The Stewardship Code

BCB Advisors LLP (“BCB Advisors”) fully supports the UK Stewardship Code (“The Code”) which was first published in July 2010, revised in September 2012 and sets out good practice for institutional investors (and investment managers) when engaging with the UK listed companies in which they invest, and is intended to enhance this relationship.

In line with the FCA’s requirements BCB Advisors’s Stewardship Code Statement discloses how they apply the Code’s Principles set out below. This Statement will always be available on request by contacting our offices.

Principle 1

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

BCB Advisors is a boutique investment manager and as such the holdings that it has in UK companies are small as a proportion of the issued share capital. BCB Advisors will only vote securities where it believes such voting to be in the best interest of its clients.

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

BCB Advisors is an independent boutique investment business and so there is a low risk of conflict of interest. In the event that a potential conflict of interest is identified the governing body of the firm will meet and determine the appropriate course of action in accordance with its conflicts of interest policy.

Principle 3

Institutional investors should monitor their investee companies

BCB Advisors undertakes research and constantly monitors the companies that form part of the client portfolios.

Principle 4

Institutional investors should establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value

As a boutique manager the influence that BCB Advisors is able to bring to bear on investee companies is limited. In the event that BCB Advisors loses confidence in the management of an investee company the investment will be divested.

Principle 5

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

BCB Advisors is willing to work collectively with other investors and will determine on a case by case basis whether such collaboration is in the best interests of its clients.

Principle 6

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

BCB Advisors' policy is to exercise voting rights where it believes, taking into account the size of the holding, it is in the interests of the underlying clients for such rights to be exercised.

Principle 7

Institutional investors should report periodically on their stewardship and voting activities

If requested to do so BCB Advisors will send details of voting record to clients

Shareholders Directive II Disclosure

Directive (EU) 2017/828 ("SRD II") was implemented in the UK on 10 June 2019. The objective of SRD II is to encourage long-term shareholder engagement with investee companies regarding performance on strategy, governance, and environmental and social issues.

SRD II requires firms like BCB Advisors to:

- Publish on its website an engagement policy or a clear and reasoned explanation of why it has chosen not to; and
- If it chooses to have an engagement policy, disclose publicly on an annual basis how it has implemented that policy.

BCB Advisors are currently deciding whether to have an engagement policy and will publish further updates to this page in due course.