

## **MAC Asset Management Limited UK Stewardship Code Disclosure**

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, MAC Asset Management Limited (the "Firm") is required to include on this website a disclosure about the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or, where it does not commit to the Code, its alternative investment strategy. The Code sets out a number of principles relating to engagement by investors with UK equity issuers, as follows:

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.

The Firm pursues an investment strategy to which the aims of the Code are not relevant.

We take a top down quantitative approach to investment based on objective financial indicators seeking exposure to particular investment sectors/markets/currencies and/or geographical locations. We do not seek to engage with management since we believe this might obscure our objective analysis, nor do we make subjective judgements on the state of investee companies' corporate governance.

Consequently, while the Firm supports the general objectives that underlie the Code, the provisions of the Code are not relevant to the type of trading currently undertaken by the Firm. If the Firm's investment strategy changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.

For further information on the Firm's approach please contact the Firm at: [info@mac-am.co.uk](mailto:info@mac-am.co.uk)