

# Stewardship Code Disclosure Statement

1st November 2019

## Tabula Investment Management Limited

(“Tabula” / the “Firm”)

Under COBS 2.2.3 of the FCA Handbook, Tabula is required to make a public disclosure in relation to the nature of its commitment to the Financial Reporting Council’s (“FRC”) Stewardship Code.

The Code aims to enhance the quality of engagement between asset managers and companies to help improve long-term risk-adjusted returns to shareholders and promote the efficient exercise of governance responsibilities. It also describes steps asset owners can take to protect and enhance the value that accrues to the ultimate beneficiary and sets out a number of areas of good practice on engagement with investee companies to which the FRC believes institutional investors should aspire. The Code is directed in the first instance to institutional investors by which is meant asset owners and asset managers with equity holdings in UK listed companies.

### The Principles of the Code

The seven principles of the Code are that institutional investors should:

1. Publicly disclose their policy on how they will discharge their stewardship responsibilities.
2. Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship.
3. Monitor their investee companies.
4. Establish clear guidelines on when and how they will escalate their stewardship activities as a method of protecting and enhancing shareholder value.
5. Be willing to act collectively with other investors where appropriate.
6. Have a clear policy on voting and disclosure of voting activity.
7. Report periodically on their stewardship and voting activities.

The FRC encourages signatories to the Code to review their policy statements annually and update them as necessary to reflect changes in actual practice.

### UK Financial Reporting Council’s Stewardship Code

FCA COBS Rule 2.2.3R requires FCA authorised firms to disclose the nature of their commitment to the FRC’s Stewardship Code (the “Code”) or, where it does not commit to the code, its alternative investment strategy.

Adherence to the Code is voluntary. Tabula is primarily a promotor and marketer of a number of passive fixed income ETFs that have been created to provide precise exposures. Specifically, some of the characteristics of the strategies include:

- The ETFs’ investment strategies involve short-term investment in a variety of securities including government bonds, CDS and Swaps.

- The ETFs do not currently invest in listed companies in the UK.

Therefore, while Tabula generally supports the objectives that underlie the Code, the nature of its investment strategy does not allow it to formally engage with investee companies through voting rights. The Firm has therefore chosen not to commit to the Code at this time.

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Tabula is required to include on this website a disclosure about the nature of its commitment to the Code” or, where it does not commit to the Code, its alternative investment strategy.

If Tabula’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 details on any of the above information, please contact Robin Grant at Tabula Investment Management Limited.