

UK Stewardship Code Disclosure

A. Introduction

Handelsbanken Asset Management (**HAM**), a trading name of Handelsbanken Wealth & Asset Management Limited (**HbWAM**), is an active, global multi-asset investor, managing assets for retail, institutional and professional clients.

B. UK Stewardship Code Disclosure

The UK Stewardship Code 2020 (the **Code**) applies on a 'comply or explain' basis and is voluntary, aiming to enhance the quality of engagement between institutional investors and the companies they invest in. Firms are required to disclose the nature of their commitment to the Code or, where they do not commit to the Code, explain why they have decided not to.

The Code sets out the 12 principles that the Financial Reporting Council believes that institutional investors should aspire to when engaging with UK equity issuers, as follows:

Purpose and governance		
Principle 1	Purpose, strategy and culture	Signatories' purpose, investment beliefs, strategy and culture enable stewardship that creates long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.
Principle 2	Governance, resources and incentives	Signatories' governance, resources and incentives support stewardship.
Principle 3	Conflicts of interest	Signatories manage conflicts of interest to put the best interests of clients and beneficiaries first.
Principle 4	Promoting well-functioning markets	Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system.
Principle 5	Review and assurance	Signatories review their policies, assure their processes and assess the effectiveness of their activities.
Investment approach		
Principle 6	Client and beneficiary needs	Signatories take account of client and beneficiary needs and communicate the activities and outcomes of their stewardship and investment to them.
Principle 7	Stewardship, investment and ESG integration	Signatories systematically integrate stewardship and investment, including material ESG issues, and climate change, to fulfil their responsibilities.
Principle 8	Monitoring managers and service providers	Signatories monitor and hold to account managers and/or service providers.
Engagement		
Principle 9	Engagement	Signatories engage with issuers to maintain or enhance the value of assets.
Principle 10	Collaboration	Signatories, where necessary, participate in collaborative engagement to influence issuers.
Principle 11	Escalation	Signatories, where necessary, escalate stewardship activities to influence issuers.
Exercising rights and responsibilities		

Principle 12	Exercising rights and responsibilities	Signatories actively exercise their rights and responsibilities.
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We invest in a variety of asset classes and jurisdictions but currently direct exposure to equity shares is relatively limited. Therefore, while we fully support the principles and objectives of the Code, we have decided not to commit to comply with the Code and we do not intend to become a signatory to the Code at this time based on our investment strategy. We will continue to review our position and the nature of our commitment to the Code.