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UK Stewardship Code Disclosure Statement

Monogram Capital Management, LLP (“Monogram” or the “Firm”) provides discretionary investment services to a variety of clients. This statement is intended to describe the Firm’s approach to the Financial Reporting Council’s (“FRC”) UK Stewardship Code. The publication of this statement is being made in accordance with Rule 2.2.3 R of the FCA’s Conduct of Business Sourcebook.

The UK Stewardship Code (“the Code”) was published by the FRC, the United Kingdom’s independent regulator responsible for promoting high quality corporate governance and reporting in order to foster investment. The Code aims to enhance the quality of engagement between institutional investors and companies they invest in. Engagement includes pursuing purposeful dialogue on strategy, performance and the management of risk, as well as on issues that are the immediate subject of votes at general meetings.

We typically invest in ETFs, futures and forward contracts in order to implement our investment strategy. We do not invest in single equities and therefore do not feel that the Code is of relevance.

In conclusion at the present time the Firm is of the view that the Code is not of direct relevance to the material part of its business. Consequently, while the Firm generally supports the objectives underlying the Code, the Firm has chosen not to commit to the Code on the grounds of materiality. If the Firm’s investment strategy changes in such a manner that the provisions of the Code become relevant, this disclosure will be amended accordingly