



**Fulcrum Asset Management LLP**

**Proxy Voting Policy**

March 2020

## **1. Introduction**

Fulcrum Asset Management LLP (“**Fulcrum**” or “**the Firm**”) is in general a top-down macro investor. Nevertheless, single stock equities play an important role in many of the strategies and, as a result, the principle of stewardship, and consequently the voting of proxies, with respect to these investments is well understood and strongly supported.

In addition, Rule 206(4)-6 of the US Investment Advisers Act 1940 requires investment advisers that exercise voting authority over client proxies to adopt and disclose policies and procedures which are reasonably designed to ensure that the adviser votes proxies in the best interests of clients.

This policy therefore seeks to set out the Firm’s policy and procedure regarding proxy voting to ensure it is done in a manner consistent with the best interests of the Firm’s clients/funds. It does not seek to address every situation, but rather provides an overview of the Firm’s approach in ensuring that good governance structures are in place in investee companies.

This policy is reviewed annually and as necessary to reflect any changes to the Firm’s voting activities.

## **2. Policy**

At Fulcrum, we aim to act in the best interests of all our stakeholders by engaging with the companies that we invest in, and by exercising our voting rights with care in order to manage, acquire and dispose of account assets. Fulcrum will vote proxies in a prudent and diligent manner and in the best interests of clients, consistent with the objective of maximising long-term investment returns and protecting shareholder rights. Not only is this commensurate with good market practice, it goes hand in hand with ensuring the responsible investment of our clients’ funds.

In order to assist the Firm in the independent assessment of governance issues, Fulcrum has appointed Glass Lewis, a leading independent corporate governance research provider, to analyse management recommendations and make vote recommendations.

In addition, the Firm has in place two committees - Responsible Investment Committee and Stewardship Committee - both chaired by the Chief Operating Officer with the aim of strengthening internal communications on stewardship issues. Both committees comprise members of the Risk, Fund Management, Compliance departments and the Firm’s Governance and Sustainability Officer. The common membership of both committees ensures consistency in the Firm’s stewardship and ESG approach.

## **3. Proxy Voting Procedure**

Fulcrum uses Broadridge’s ProxyEdge platform for proxy voting. All the voting recommendations relevant to the Firm’s clients and funds are provided by Glass Lewis through Broadridge’s platform.

Fulcrum will vote with the independent research recommendations unless it chooses to override it based on its own analysis.

## **4. Conflicts of Interests**

Although unlikely, the Firm recognises that there may be instances where a conflict of interest may present itself with respect to a vote and affect the Firm’s ability to act in the best interests of its clients/funds.

Where that is the case, the conflict will be escalated to the Chief Operating Officer and discussed with the relevant fund managers. The underlying information and recommendations will be reviewed, and the Firm will consider the most adequate solution in a manner that affords priority to the interests of the Firm’s clients. If deemed necessary, guidance from outside legal counsel will be sought.

Nevertheless, as Fulcrum has contracted Glass Lewis to provide the corporate governance voting recommendations relevant to the Firm’s investee companies, the Firm will generally follow these by default.

## **5. Records of proxy voting**

Fulcrum maintains a record of all proxy voting decisions for a period of seven (7) years.