

## **UK Stewardship Code (2020) Disclosure Statement**

**April 2025**

### **American Century Investment Management (UK) Limited ("ACIM UK" / the "Firm")**

Effective from 1 January 2020, the Financial Reporting Council's ("FRC") UK Stewardship Code (the "Code") has been substantially updated to be applicable to a broader range of investment strategies, other than purely listed equity, such as fixed income bonds, real estate and infrastructure. It also reflects the growth of environmental factors, particularly climate change, as well as social and governance factors (together, "ESG") as material issues for asset managers to consider when making investment decisions and undertaking stewardship.

In the 2020 version, the Code defines stewardship as "the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society".

### **The Principles of the Code**

There are twelve Principles of the Code that apply to asset owners and asset managers. These are grouped under four headings:

#### **Purpose and governance**

1. Purpose, strategy and culture
2. Governance, resources and incentives
3. Conflicts of interest
4. Promoting well-functioning markets
5. Review and assurance

#### **Investment approach**

6. Client and beneficiary needs
7. Stewardship, investment and ESG integration
8. Monitoring managers and service providers

#### **Engagement**

9. Engagement
10. Collaboration
11. Escalation

#### **Exercising rights and responsibilities**

12. Exercising rights and responsibilities

The FRC requires that firms aiming to be signatories to the Code must produce an annual Stewardship Report explaining how they have applied the Code in the previous 12 months. The FRC will evaluate Reports against an assessment framework and those meeting the reporting expectations will be listed as signatories to the Code.

### **FCA Regulatory Disclosure on the Stewardship Code**

Rule 2.2.3R of the Financial Conduct Authority (“FCA”) Conduct of Business Sourcebook (“COBS”) requires an FCA authorised firm to disclose the nature of its commitment to the FRC’s UK Stewardship Code or, where it does not commit to the code, its alternative investment strategy.

The Code is a voluntary code and sets out a number of principles relating to engagement by investors with the companies or other assets in which they are invested. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non-compliance.

ACIM UK currently manages a number of Segregated Managed Accounts (SMAs). The day-to-day activities relating to such mandates are delegated to American Century Investment Management (“ACIM US”), US-based affiliate as sub-advisor, to manage their ACIM’s SMAs. ACIM does not engage in stewardship practices because ACIM US is or may be responsible for such activities. In terms of Proxy voting, neither ACIM UK nor ACIM US undertake proxy voting on behalf of the SMAs.

While ACIM UK generally supports the objectives that underlie the Code, ACIM UK has chosen not to commit to the voluntary Code as the provisions of the Code are not considered to be relevant to the activities currently undertaken by the Firm. If ACIM UK’s activities changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.